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final environmental statement

USDA FOREST SERVICE ENVIRONMENTAL STATEMENT
LAND USE PLAN FOR THE MT. BUTLER-DRY CREEK PLANNING UNIT

USDA-FS-R6-FES-Adm.-75-13

Prepared in Accordance With
Section 102 (2) (c) of Public Law 91-190

Summary Sheet

- I. Draft () Final (X)
- II. Forest Service
- III. Administrative (X) Legislative ()
- IV. The proposed action consists of a land use plan for management of a largely roadless, 22,100 acre Planning Unit on the Siskiyou National Forest. The Unit begins 4 air-miles east of the coastal town of Port Orford in Curry County, Oregon. The proposed action recommends a balanced mix of land allocations designed to sustain a high level of timber harvest, to develop the Unit's primitive recreation potential, and to protect the soil, water, fish, wildlife, aesthetic, and other resources. Most of the Dry Creek drainage is designated a Timber Management Area. Almost all of the Elk River drainage outside Butler Creek is designated a roadless Fisheries/Wildlife Area. Fisheries/Recreation Areas totalling 2,500 acres are designated along Dry Creek and Rock Creek.
- V. The proposed action will result in both favorable and adverse environmental impacts. The greatest favorable impact will accrue to the socio-economic environment at the local and regional levels. The Unit's contribution to the Forest's programmed harvest and its contribution to the annual fish harvest will continue at slightly reduced levels relative to the present. Employment and other economic activity dependent on these resources will also continue at near existing levels. Relative to other alternatives considered which provided lower output levels of these resources, the socio-economic impacts are favorable.

Most wildlife species, including most game species, will benefit from the proposed action. Much of the Unit's primitive recreation potential will also be realized. Finally, 45% of the Unit will be managed to largely maintain existing natural conditions. Relative to other alternatives considered which developed either more or all of the Unit, this alternative will favorably affect flora, fauna, and other non-timber resources and values.

Adverse environmental effects will impact the soil, water, air, fisheries, wildlife, aesthetic, and wilderness resources. With the exception of the wilderness resource and one threatened (State list) wildlife species, the impact on these resources will be light to moderate. However, the opportunity for future statutory Wilderness designation

for the roadless areas in the Unit will eventually be pre-empted by implementation of the proposed action. Suitable habitat for the northern spotted owl, a bird on the State threatened list, (but not the National list) may be reduced by as much as 55% over a period of 50 years. However, most of the prime habitat will be preserved and known specimens will be protected.

VI. Five alternatives to the proposed action (Alternative 3) were analyzed and evaluated. They are presented in detail in section VI of the main body of this statement. Briefly stated here, they are:

1. All suitable roadless acreage in the Unit, or 16,500 acres, would be designated a new wilderness study area. Most of the remaining acreage would be developed for intensive timber management.
2. Most of the Dry Creek drainage would be designated a Roadless Recreation Area. Most of the Butler, Rock, and Anvil Creek drainages would be developed for intensive timber management. The remaining 6,400 acres in the Elk River watershed would be designated a roadless Fisheries/Wildlife Area.
4. Most of the Unit would be developed for intensive timber management. A 5,600 acre roadless Fisheries/Wildlife Area along and above the Elk River would be managed primarily to protect the existing fisheries, wildlife, watershed, and aesthetic values.
5. The entire Unit would be developed for intensive timber management.
6. No action would be taken to develop a comprehensive land use plan for the Planning Unit.

VII. Comments on the Draft Environmental Statement were received from:

Federal Agencies

U. S. Environmental Protection Agency
U. S. Department of the Interior
U. S. Department of Housing and Urban Development
Corps of Engineers, Department of the Army
U. S. Department of Commerce

State Agencies

Oregon State Highway Division
Department of Geology and Mineral Industries
Executive Department, Intergovernmental Relations Division
Oregon Wildlife Commission
Fish Commission

Local Agencies

City of Port Orford
Port Orford Port Commission
City of Powers
City of Coquille
Curry County Planning Department
Coos County Board of Commissioners
Curry County Board of Commissioners

Organizations

American Fisheries Society, Oregon Chapter
North West Timber Association
Powers Chamber of Commerce
Moore Mill and Lumber Company
Southern Oregon Timber Industries Association
Cabax Mills
Friends of the Earth, Inc.
Survival Center - Associated Students, University of Oregon
Industrial Forestry Association
Oregon Environmental Council
Western Forest Industries Association
Georgia Pacific Corporation
Society of American Foresters, Coos Chapter
Coquille Chamber of Commerce
North Bend Chamber of Commerce
Northwest Steelheaders Council of Trout Unlimited
Coos Head Timber Company
Myrtle Point Chamber of Commerce
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Form Letter #1 and List of Signers
Form Letter #2 and List of Signers
Form Letter #3 and List of Signers
Form Letter #4 and List of Signers
Form Letter #5 and List of Signers
Form Letter #6 and List of Signers
Form Letter #7 and List of Signers
Petition #1 and List of Signers

Other Respondents

Port Orford Chamber of Commerce
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American Legion Auxiliary
Rose City Archery, Inc.
Menasha Corporation
Northwest Steelheaders Council of Trout Unlimited
Rogue Lumber Sales, Inc.
Agnew Timber Products
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VIII. Date the Environmental Statement was made available to the Council on Environmental Quality and the public:

Draft Environmental Statement: March 24, 1975

Final Environmental Statement: MAY 20 1976

USDA FOREST SERVICE ENVIRONMENTAL STATEMENT
LAND USE PLAN FOR THE MT. BUTLER-DRY CREEK PLANNING UNIT

Prepared in Accordance With
Section 102 (2) (c) of Public Law 91-190

Type of Statement: Final

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Type of Action: Administrative

Responsible Official: William P. Ronayne, Forest Supervisor
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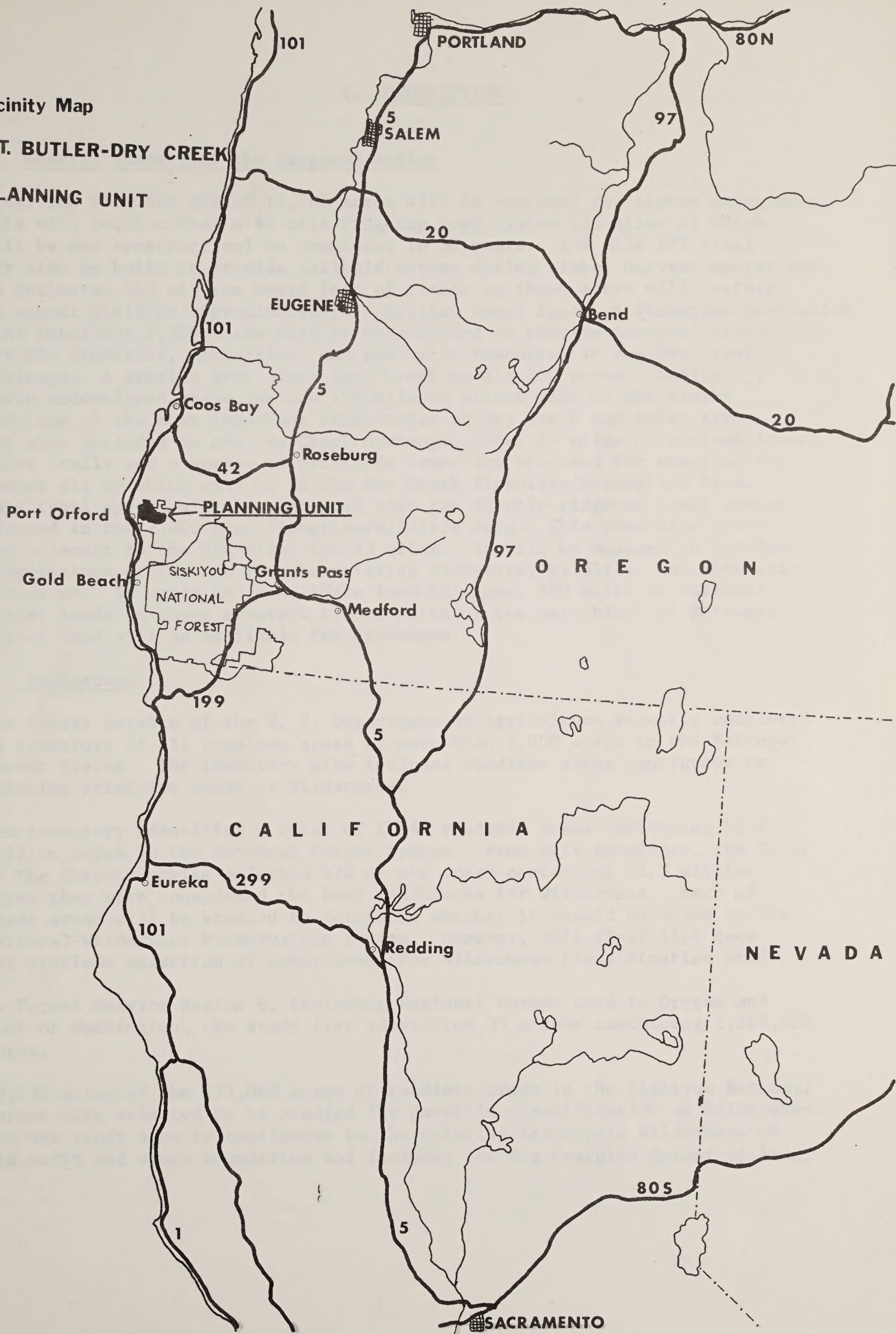
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Vicinity Map

MT. BUTLER-DRY CREEK

PLANNING UNIT



PLANNING UNIT
MT BUTLER-DRY CREEK



I. DESCRIPTION

A. General Summary of the Proposed Action

Under the PROPOSED ACTION 11,700 acres will be accessed for timber management. This will require that a 40 mile ridgetop road system (31 miles of which will be new construction) be completed in 30 years. A 4 mile ATV trail may also be built to provide tailhold access during timber harvest operations. An estimated 362 million board feet of timber on these acres will sustain an annual yield of approximately 4.9 million board feet. A Fisheries/Recreation Area totalling 2,300 acres will be established to provide improved protection for the fisheries, recreation, and aesthetic resources in the Dry Creek drainage. A similar area along Rock Creek totals 200 acres. Basically, these undeveloped areas include 1/8 mile on either side of the creeks. Portions of the most important tributaries of Dry Creek and other areas are also included in the Dry Creek drainage. Some 14 miles of minimum impact hiker trails and a number of primitive camps are proposed for construction, almost all of which will be in the Dry Creek Fisheries/Recreation Area. This trail system will be connected with the 12 mile ridgetop trail system planned in the 7,400 acre Fisheries/Wildlife Area. This area lies above and adjacent to the Elk River for 13 miles. It will be managed to provide near-maximum protection for the existing fisheries, wildlife, and aesthetic resources. In order to consolidate land holdings, 500 acres of National Forest lands in three separate tracts north of the main block of National Forest land will be available for exchanges.

B. Background

The Forest Service of the U. S. Department of Agriculture recently completed an inventory of all roadless areas of more than 5,000 acres in the National Forest System. The inventory also included roadless areas contiguous to existing primitive areas or Wilderness.

The inventory identified a total of 1,449 roadless areas containing 55.9 million acres in the National Forest System. From this inventory, the Chief of the Forest Service selected 274 of the areas containing 12.3 million acres that were considered the best candidates for Wilderness. Each of these areas will be studied to determine whether it should be added to the National Wilderness Preservation System. However, this final list does not preclude selection of other areas for Wilderness classification study.

In Forest Service Region 6, including National Forest land in Oregon and most of Washington, the study list identified 35 areas containing 1,268,420 acres.

18,232 acres of the 275,000 acres of roadless areas in the Siskiyou National Forest were selected to be studied for possible classification as Wilderness. The new study area is contiguous to the existing Kalmiopsis Wilderness on its north and south boundaries and includes the Big Craggies Botanical Area.

Forest Service policy (FSM 8411.3) states that "...Environmental statements will be prepared on major proposed plans, programs, and projects directly undertaken by the Forest Service..." This policy includes land use planning for all inventoried roadless areas not selected for Wilderness study. Any activities which would alter the wilderness character of a given roadless area will be prohibited until initial land use planning and the Environmental Statement covering that area are complete.

The 12,000 acre Grassy Knob Inventoried Roadless Area (B11) and the 4,500 acre Redcedar-Sunshine Inventoried Roadless Area (B13) account for 75% of the 22,100 acre Mt. Butler-Dry Creek Planning Unit. Roadless area B11 was not recommended for wilderness classification study in the roadless area review and evaluation (RARE). Land use studies subsequently determined that additional acreage along the perimeter of and to the southeast of roadless area B11 also qualified for inventoried roadless area status. This additional acreage has been identified as the Redcedar-Sunshine Inventoried Roadless Area (B13). The land use alternatives considered for this Unit fully reflect this revision.

The Mt. Butler-Dry Creek Planning Unit was selected by the Forest Supervisor as the second such unit on which an Environmental Impact Statement would be prepared. The Unit, largely undeveloped at the present time, was selected because of the information available from two multi-discipline studies on the Unit. The first, initiated in 1970, covered the eastern third of the Planning Unit. The remaining two-thirds of the Unit has been studied since early 1972.

C. Geographical

The Mt. Butler-Dry Creek Planning Unit is located in southwestern Oregon and in the extreme northwest corner of the Siskiyou National Forest. Its western boundary begins some 4 airline miles east of the coastal town of Port Orford. The Unit is within Townships 32 and 33 South; Ranges 13 and 14 West; Willamette Meridian; Curry County, Oregon.

Virtually all of the 22,100 acres in the Unit can be characterized as very steep, rugged terrain. (An additional 4,200 acres of non-National Forest lands, not directly subject to these plans, are within the Unit boundaries. Most of these acres are along the north and west sides and outside of the original proposed Forest Service retraction line. 1/)

1/ This proposal would consolidate land ownership patterns by retracting the National Forest boundary where National Forest lands and privately-owned lands are intermingled. Approximately 2,000 acres of National Forest land along the north and west Unit boundaries would be available for exchange with private landowners. In exchange, the Forest Service would acquire private lands along the Rogue River or elsewhere on the Forest. One of the primary objectives of the boundary adjustment program is to consolidate National Forest land holdings for more efficient land management.



Port Orford

Resource values are high. While all resources are important in this Unit, the most valuable appear to be the fisheries resource and the timber resource. The latter consists of approximately 572 million board feet of standing timber. This could sustain an annual yield of as much as 7.4 million board feet.^{1/} The fisheries resource in and adjacent to the Unit is important to both commercial and sport fishermen. It is worth approximately \$1.5 million per year.

The Unit is highly sensitive to physical impacts. The potential for serious damage to fisheries, soil, water, wildlife, amenity, and other resources must be considered high. Whatever the land use, only the most careful, skillful, and sophisticated management available will be appropriate.

^{1/} Annual yield as used in this document refers to a planning estimate of the sustainable annual yield from this Planning Unit based on present day technology, economics, and timber management practices. It should neither be confused with nor compared with the Forest's programmed annual harvest which has been calculated for and is accurate for the entire Forest only. Further, the planning estimate will do nothing to vary the current allocation of the programmed harvest to the Powers Ranger District.

Precipitation averages 85-90 inches annually--almost all of it in the form of rain. Snowfall is generally light and of short duration because of the low elevations and the moderating marine influences. The rainfall is cyclic, coming almost entirely in the late fall, winter and spring. Because of this, soil-geologic conditions, and steep slopes, runoff approximates 65 inches per year.

Mean temperature during the winter months is in the mid 40 degree range with short period extremes in the low 20 degree range. Mean summer temperature is in the mid 60 degree range with short period extremes ranging above 90 degrees. Length of the frost-free growing season ranges from less than 200 to more than 240 days, depending mostly on elevation.

The proximity to the coast not only modifies the temperatures and humidities found on the Unit but also results in frequent high wind velocities--particularly during winter storms. These generally westerly winds commonly reach 40 miles per hour with 100 miles per hour winds occasionally recorded. Evidence of significant wind-caused damage can be found in and adjacent to the Unit.

Elevation ranges from less than 100 feet along Dry Creek as it leaves the northwest corner of the Unit to 2,939 feet on top of Mt. Butler. Slopes are consistently steep, averaging about 80%. Rocky, razor-back ridgetops are the rule and rock bluffs are common throughout the Unit.

The Planning Unit spans part of two watersheds. Dry Creek is a highly important tributary of the Sixes River watershed. Butler Creek, Sunshine Creek, Red Cedar Creek, Slate Creek, Anvil Creek, and Rock Creek are important tributaries of the Elk River watershed. This river forms the southern boundary of the Unit for more than 13 miles.

The U. S. Geological Survey has studied two powersites that would affect portions of the Unit along its northern and southern boundaries. The Beaver Creek site, also called the Sixes site, located outside the Planning Unit boundary, would utilize a 140-foot high dam to an altitude of 160 feet in sec. 10, T. 32 S., R. 15 W., to store 113,000 acre-feet of water on the Sixes River. Water would be backed ten miles upstream through portions of secs. 8 and 9, T. 32 S., R. 14 W., inside the Unit boundary. The Sixes dams site was surveyed in 1959. The Slate Creek site, located on the Elk River, would develop 500 feet of gross head with a 200-foot high dam in sec. 23, T. 33 S., R. 14 W., and a four-mile long conduit to a powerhouse in sec. 7 of the same township. Power development at the two powersites would total about 17MW, equivalent to the energy available in 158,000 barrels of oil annually.

No plans are known to be under active consideration for hydroelectric development in the Planning Unit area and no lands have been classified for such development. The Columbia-North Comprehensive Framework Study, Appendix XVI (1972), recommended that the Sixes and Elk Rivers be studied for preservation in their free flowing state, which could preclude power development.

More than 3,300 of the 4,200 acres of private land within the Unit lie north of the proposed Forest Service boundary retraction line. Another 700 acres of private lands lie outside of the original proposed western boundary retraction line. The remaining 200 acres are found in a block along the Elk River. Most of these generally productive timber growing private lands have been logged and are growing back to hardwood and conifer stands.

A summary of the data presented follows and a map of the Planning Unit can be found on the next page. The data is further expanded and analyzed in the presentation of the PROPOSED ACTION and the various alternatives to it.

General Statistics

The Mt. Butler-Dry Creek Planning Unit is located in the extreme northwest corner of the Siskiyou National Forest beginning some 4 air miles east of the coastal town of Port Orford. The Unit contains approximately 22,100 acres of very steep, rugged National Forest lands. Values for several resources are high. So is the sensitivity of the Unit to physical impacts.

National Forest Land.....	22,100 acres
Other Ownerships.....	4,200 acres
Total Planning Unit Acreage.....	26,300 acres
Inventoried Roadless Area B11.....	12,000 acres
Inventoried Roadless Area B13.....	4,500 acres

Average Annual Precipitation.....	85-90 inches
Mean Winter Temperature.....	45°F
Mean Summer Temperature.....	65°F
Frost-Free Growing Season.....	200-240 days
Elevation Range.....	100-2900 feet
Average Slope.....	80%

Total Merchantable Timber Volume.....	.572 MMBF
Existing Non-System Road.....	7 miles
- to be reconstructed.....	4 miles
- to be abandoned.....	3 miles
Existing System Roads.....	9 miles
Non-Maintained or Abandoned Trails.....	18 miles
Anadromous Fish Streams.....	23 miles
Perennial Streams.....	71 miles
Critical Soils (See Page 14).....	20,000 acres

D. History and Archeology

The Planning Unit is a part of the Coos County-Curry County area. This area has a colorful and exciting history predating the arrival of the white man. However, records prior to 1850 are sketchy or non-existent.

Historians credit the Quah-to-Mah band of the To-To-Tin Indian nation as the inhabitants of the area when the first substantial number of whites arrived around 1850. An 1854 census taken by a government Indian agent found 143 men, women, and children in this band residing in three villages--Floras Creek, Sixes River, and Port Orford. Related bands located mostly along the coast from the Coquille River in the north to the California border in the south brought the population of the nation to over 1,300.

The pioneers were drawn into the area by the discovery of gold in northern California and southern Oregon during 1850-51. This movement was spurred by the subsequent discoveries a few years later on tributaries of the Coquille River and on ledges along the Elk and Sixes Rivers. By 1860, there were 5 hydraulic mines operating on the Sixes. These supported quite a mining population for some years. It is unclear whether the placer mining operation located near the mouth of Dry Creek and known as the Big Jewel commenced during this early period or some years later.

The Big Jewel operation probably produced the first substantial man-made impact on the Unit. A timber dam was constructed on the North Fork of Dry Creek in order to develop a head for the hydraulic giant near the mouth of Dry Creek. A ditch perhaps 6-8 feet wide and 3 feet deep was dug by hand for an estimated 6 miles to connect the dam and the hydraulic giant. Creeks along the route were tapped and many sections were flumed and trestled across major draws.

The flume and trestle operations required Port Orford cedar lumber. Logs were felled along Dry Creek, hauled by wagon down the creek to a sawmill near the mouth, and returned upstream as lumber suitable for construction. A camp was maintained for the workers at Velvet Flat, a 5-6 acre area above Dry Creek and some 2 1/2 miles upstream from its mouth. Although this was the first and only large mining venture to have an impact on the Unit, a number of small-time miners have operated in the Dry Creek drainage and along the Elk River.

Forest products immediately became important in the early economy. The most important tree species in descending order of importance were Port Orford cedar, Douglas-fir, and tanoak. The latter was valued for the tannin in the bark and for the acorn crop which fed the domestic hogs. A substantial lumber production and export industry developed around the other two species.

The first sawmill arrived in Port Orford by steamer in 1854. It processed 5,000 board feet per day and employed 25 men. It is said that William S. Winsor, the mechanical manager of the operation, first named the high value wood Port Orford cedar during his preparation of the first shipment to San Francisco. In that city, first class lumber brought \$125 per thousand board

feet (MBF) while lesser quality material sold for \$25 per MBF. By 1883, the first mill had ceased operations and the Hubbard Creek mill, built in 1874, was producing 17 MBF per day while the newly-constructed Elk Creek mill produced 10 MBF per day. The primary market continued to be San Francisco.

Although it is highly unlikely that any trees were harvested within the Unit during this period, some trees were harvested along Dry Creek by 1917. At that time, the cedar was sought for airplane wings. One long-time resident remembers an earlier harvest in the area for railroad cants. The next cedar harvest along the creek was for battery separator stock during the 1930's. The Forest Service sold the spike-topped and downed cedar trees along Dry Creek. Only the clear wood could be used so those logs were floated downstream during high water.

Despite a number of plans to re-enter the area, the battery separator stock operation in the 1930's apparently was the last timber harvest entry in the Unit until the 1960's. By the late 1950's the Elk River drainage was beginning to be accessed for timber harvest. Several years later, in the early 1960's, the first timber harvest in the Planning Unit occurred in the Butler Creek drainage. Shortly after the commencement of timber harvest activities in Butler Creek, the private owners of Section 36, in the headwaters of the Dry Creek, accessed and began harvest operations on their land. (The Forest Service acquired Section 36 in 1972). Since that time, logging has progressed only in the Butler Creek drainage with the exception of a couple small salvage units along Elk River.

One of the benefits of historical review in a given area for those charged with future sustained yield management, is an improved knowledge of the ecosystem dynamics in the area. Sources of information include agency records, on-the-ground data, and long-time local residents. It is fortunate that a substantial amount of this type of information is available on this sensitive Planning Unit from the above-mentioned sources.

Floods, fires, natural slides, road construction, and timber harvest activities have been the primary agents of change in the Unit. Long-time local residents have noted a change in the character of Dry Creek, Elk River, and Sixes River. They remembered that each of these rivers had narrower, deeper channels in earlier times. Less gravel was evident. In addition, the stream-flow in the Sixes was more uniform with more moderate high water and low water extremes. The Sixes River, draining a watershed 67% privately-owned, apparently had its character and quality rather abruptly changed following extensive logging activities in the 1950's.

Dry Creek was described as a stream with deeper holes, less streambed gravel, and greater populations of cutthroat trout and salmon-even during the summer. During the last 50 years and most markedly in recent times, as much as 4-5 feet of streambed gravel has been added according to one long-time local resident. Water level extremes and fish populations were adversely affected, according to the same source.

Residents remember floods playing a major role in the alteration of the Elk River system. A 1927 flood on the Forest was described as "the worst of all time." Several sources recalled the big flood in either 1939 or 1940. In that flood, a logjam on Butler Creek burst, washing the creek to bedrock almost its entire length. Trappers remember having to dig 2-3 feet into newly-deposited gravel along the Elk River to recover their traps following the flood. One Fish Hatchery employee believes that the 1955 flood fundamentally changed the river. He found the river wider, shallower, and less protected by vegetation following the severe flood. The most recent severe flood occurred in 1964. In addition to the various effects on the creeks and rivers, the heavy rains which caused the floods undoubtedly triggered many of the natural massive landslide events on the Unit.

Fire has played a major role in the Unit's natural history. Existing timber type patterns and other on-the-ground conditions are evidence of this. Long-time local residents and historical accounts also document this.

One resident recalls standing on the ridges above and just north of Dry Creek early in this century. He could see only grass and small brush on all of the 7-8 south aspect ridges above Dry Creek. Today most of that area is covered by large, moderately to well-stocked, second growth Douglas-fir stands. The wildlife species commonly found in the Unit included deer, bear, bobcat, raccoon, muskrat, beaver, large woodpeckers, mink, cougar, bald eagles, and a few elk several miles north of Dry Creek. Since then, only the elk is thought to have increased in numbers.

The first recorded large fire, often mentioned in historical accounts, occurred in October 1868. Large fires allegedly were burning along much of the coast at that time. This particular fire swept into the coastal settlement of Port Orford from the north and east, destroying the community. It was said that the fire burned hotter and longer 12 miles inland (which would place it in the Planning Unit).

A large 1889 fire burned in the Salmon Mountain area just east of the Planning Unit but it probably didn't reach the Unit itself. However a 9,000 acre fire burned the Grassy Knob area in the Unit during September, 1927. One of several hundred incendiary fires that same year burned another 9,000 acres just east of the Unit along the North Fork of Elk River. In 1930, a 916 acre fire burned the Barklow Mountain-Copper Mountain country to the south and east of the Unit. One long-time resident recalls many smaller incendiary fires in the Unit--particularly during the Depression. This same source also recalled an alleged Japanese attempt to drop a fire bomb near Grassy Knob during World War II. However, other sources do not mention this.

Fire control was the primary reason for construction of a trail system running from Grassy Knob to Mt. Butler and Barklow Mountain to Iron Mountain (most of this system has not been maintained for years). In 1935, a lookout cabin was built on Grassy Knob, complementing the Mt. Butler lookout. Neither structure remains today.

The effects of reoccurring fires in the Unit include: more open-grown timber stands in some areas; heavy conifer regeneration in other areas; the creation of hard-core, low site brushfields on many southern aspects; and heavy erosion resulting in much of the existing rock mulch pavement.

Two unwanted plants have invaded the area in and around the Planning Unit this century. One historian recalled seeing gorse for the first time in 1894 at a Lord Bennett's home in Bandon. Local residents introduced it along the Elk River for ornamental purposes. Today it can be found growing wild all over the general area, including a few pioneer species in the Unit. The second plant is tansey ragwort. It was first observed in the area around 1840. Today this prolific plant, which is toxic to cattle, can be found growing throughout the region - including the Unit.

There have been a number of long range plans put together for the area over a good many years. As recently as the late 1950's the long-range transportation plan called for a large road network to develop the area. This network included ridgetop, midslope, and creek bottom roads. However, entry for timber harvest was repeatedly postponed due to submarginal economics caused by construction of roads in very difficult terrain.

By 1968, the concept of a ridgetop road system for the area was becoming accepted as the best way to proceed. In 1969, the Forest let a contract for construction of a surfaced road from Highway 101 to the western Forest boundary. The construction was completed in 1970. Also, in 1969, the "Mt. Butler Accelerated Road Plan" was initiated. This plan considered a ridgetop through-route from the end of the existing Road 326 on the west Forest boundary to the existing Road 326 on the south side of Mt. Butler. This project was terminated during the preliminary design stage due to the cancellation of funds for accelerated road projects. However, it did halt any further penetration of the Unit on a piece-meal basis. The multi-discipline Land Use Planning Team was first directed to make a study of and produce alternative plans for the Unit in 1970.

In compliance with Section 106 of the National Historic Preservation Act of 1966, the National Register of Historic Places as listed in the February 19, 1974 issue of the Federal Register was consulted. (Later copies of the Federal Register were also consulted to consider updates on that list). It was determined that no National Register properties are affected by the PROPOSED ACTION. Further, the PROPOSED ACTION will serve to maintain the opportunity for discovery of additional sites, if any exist.

Section 101(b)(4) of the National Environmental Policy Act and Sections 1(3) and (2) of Executive Order 11593 have also been complied with. It has been determined that the PROPOSED ACTION will not affect any lands seemingly with characteristics for future nomination to the National Register of Historic Places. Further, it will not affect, either favorably or adversely, anything of historical, archeological, architectural, or cultural significance.

This information was submitted to the Oregon State Historical Preservation Officer through correspondence with Paul Hartwig, Oregon State Park Historian.

E. Socio-Economic

Forestlands are highly important to the counties surrounding the Planning Unit. They are basic to the economy and have a major influence on the life styles of county residents. Indeed, approximately 94% of Curry County, the county containing the Planning Unit, is forestland.

Most of the land in Curry County is publicly-owned. National Forest lands account for 54% of all land, other public ownership 12%, and private ownership 34%. Commercial Federal forestlands account for more than 52% of the 1,042,560 acres in Curry County. In recent years, the receipts to the County from Federal lands have averaged approximately 45% (about \$2.2 million) of the total County receipts.

Lands on the Siskiyou National Forest produce a wide variety of economic, social, environmental, and other benefits each year. The largest economic benefit is related to the harvesting of timber. In recent years, National Forest timber has become relatively more important to the Curry County economy as harvests from privately owned lands have declined.

Timber harvesting and wood products manufacturing constitute the major industry in the County. 1974 statistics indicate that nearly 26% of those employed were working in this industry. The following labor market analysis from Oregon State Employment Division statistics illustrates the employment picture.

1974 Labor Market Analysis for Curry County

Approximate Population	13,650
Labor Market	5,780
% Unemployed	9.2%
Total Employed Labor	5,250
Employment in Lumber and Wood Products	1,350
% Employed in Lumber and Wood Products	25.7%

A "basic" industry is one which generates a net monetary inflow to a region from outside regions. They are essential for any local economy in our modern society. Employees of basic industries and their families require a large variety of goods and services. These needs create a demand for clerks in stores, gasoline station employees, doctors, dentists, and many other jobs. Most of this employment is labelled "non-basic" in that it brings in very few net dollars from outside regions--most of the goods and services are consumed locally. It has been estimated that each 100 basic jobs will generate demand for as many as 200 non-basic jobs on a regional basis. However, this ratio varies considerably and is often much lower in small, rural economies.

Most of the lumber and wood products employment can be considered basic employment since few of the manufactured products are consumed locally. With nearly 26% of the labor force directly dependent on this industry, it would seem reasonable for this area that 55-60% of the total labor force is either directly or indirectly dependent. Therefore, the lumber and wood products industry is the dominant factor in the economy of Curry County.



Local Plywood Mill

Historically, the economies dominated by a single industry have been unstable--boom or bust depending on the fortunes of that particular industry. This has been particularly true of economies dominated by the lumber and wood products industry which is sensitive to a number of factors over which they have little control. Weather is an obvious factor which causes seasonal fluctuations. However, economic factors are generally more important. For example, when national policy is to restrict monetary growth, the cost of borrowing money (the interest rate) is often sharply increased. Long-term personal loans such as those normally applied for by home buyers or builders tend to be the most responsive, resulting in a drastic reduction in homebuilding. The opposite response occurs when monetary expansion is promoted. The impact in either case rapidly reaches the plants processing the raw timber and the operators harvesting it. To continue the case of monetary restriction, sales of finished products decrease while inventories increase. In order to correct this situation, plants and operators reduce the working hours or even shut down. Many of the smaller marginal plants may never reopen. Unemployment increases and where this industry is a major component of the economy, this effect heavily impacts the non-basic segment of the economy. In short, the entire economy is depressed in this case. In good times, the entire economy would be vigorous. The degree of either state depends on many factors including severity of the demand change and the relative dependency of that local economy on the lumber and wood products industry.

A good industrial mix in a local economy minimizes the impact from fluctuation in any given industry, resulting in balanced growth and a relatively stable economy. Unfortunately such an industrial mix is not characteristic of small rural economies. Most have not developed beyond a high degree of specialization in a single raw material production industry. And where production levels are tied to land capabilities, economic growth is limited at best. In fact, the prospects of sustaining the present level of economic activity in southwestern Oregon communities appears to be poor unless greater economic diversification is accomplished, timber utilization improves, and the level of timber management increases on private and public forestlands. Existing processing capacity for the wood processing industry in Southwest Oregon has been estimated to be approximately twice the sustained capacity of the land to produce the timber at projected levels of timber management.^{1/} However, the ratio appears to be somewhat more favorable for Curry County.

The tourism and recreation industry is the second most important industry in Curry County. It has grown rapidly in recent years and may continue to do so over the long run. Energy shortages may adversely affect this industry over the short term but it is likely that recreationists will adjust mode of transportation, type of recreation, length of stay, and other factors rather than stop recreating.

The third largest income producer in Curry County is agriculture, the largest components of which are specialty horticultural crops, dairy cattle, and beef cattle/calf operations. Extensive growth in agriculture is unlikely due to the relatively small agricultural land base and the nature of that base.

Other sizeable industries in Curry County include fisheries and public employment. Intensive fisheries management may allow some growth in the fisheries industry although much of this is related to the recreation industry. Growth in public employment, a generally stable industry, is primarily dependent on local, state, and national investment priorities.

Per capita income in Curry County averaged \$4,063 in 1973 or 84% of the average per capita income for the entire state during the same year. The trend since 1969 indicates that although the rate of increase in Curry County slightly exceeded that for the entire state, the absolute difference increased \$167. Data shows that 30% of the families in Curry County earned less than \$6,000 per year during 1970 and nearly 12% had incomes below the poverty level.

Unemployment rates have traditionally run ahead of both the state and national rates. For example, in 1972 unemployment in Curry County averaged 6.8% while the national average was 5.6%. County trends have also shown greater seasonal fluctuations. For instance, the monthly rate in 1972 varied between 4.6% in August and 9.8% in February.

^{1/} This can be seen by comparing data in the following reports:

1. Timber Trends in Western Oregon and Western Washington. 1963. Pacific Northwest Forest and Range Experiment Station. Portland.
2. Timber Flows and Utilization Patterns in the Douglas-fir Region, 1966. 1969. John W. Austin. Pacific Northwest Forest and Range Experiment Station. Portland.

Racial minorities account for less than 3% of the total population in the County. Spanish-speaking people and American Indians account for almost all of this population.

F. Geology and Soils

Land forms in this Unit are typically steep and highly dissected. Slopes average about 80% but slopes exceeding 100% and rock bluffs are common. Slopes are convex in shape but ridgetops are typically razor back.

The geologic formations of this Planning Unit in descending order of National Forest acreage represented are: Rocky Point formation; Humbug Mountain formation; Galice formation; Pearse Peak diorite; Otter Point formation; Umpqua formation; and Quaternary alluvium.

The Rocky Point formation extends over approximately 49% of the Unit including most of the Dry Creek drainage. This is a sedimentary formation composed primarily of sandstone and mudstone and also containing some conglomerate. It is not known to contain valuable minerals.^{1/} The soils derived from it tend to be moderately productive in this Unit.

Some 32% of the National Forest lands in the Unit are on the Humbug Mountain formation. This sedimentary formation is composed primarily of conglomerates but also contains sandstone as a minor component. Like the Rocky Point formation, it is not known to contain valuable minerals.^{1/} The soils derived from it appear to be moderately productive in this Unit, although less productive than those derived from the Rocky Point formation.

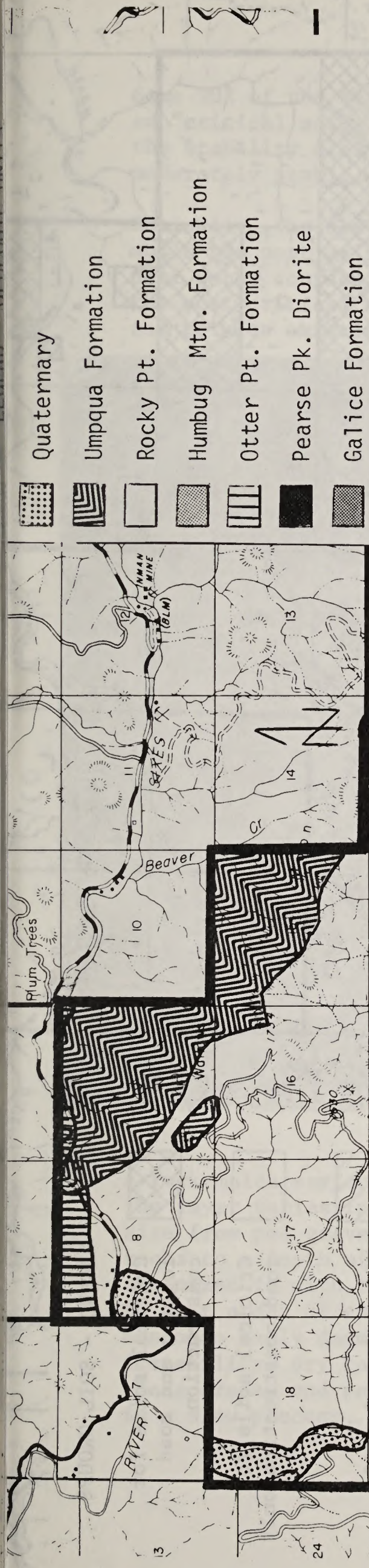
The Galice formation extends over 11% of the Unit and is confined to the slopes immediately north and above Elk River. This formation contains metasedimentary and metavolcanic elements. Mineralization in the form of precious metal-bearing lode deposits in association with copper, lead, zinc, and possibly other sulfides may occur in this formation and in the fringe area of the Pearse Peak formation.^{1/} The soils derived from it tend to be poorly-productive on this Unit although pockets of good productivity can be found at Sunshine Flat and elsewhere.

The Pearse Peak diorite formation extends over 7% of the Unit and is confined to the slopes north and immediately above Elk River. The poorly-productive soils are derived from diorite and quartz diorite.

The remaining formations generally are moderately productive. However, they extend over a total of less than 1% of the Unit's National Forest land.

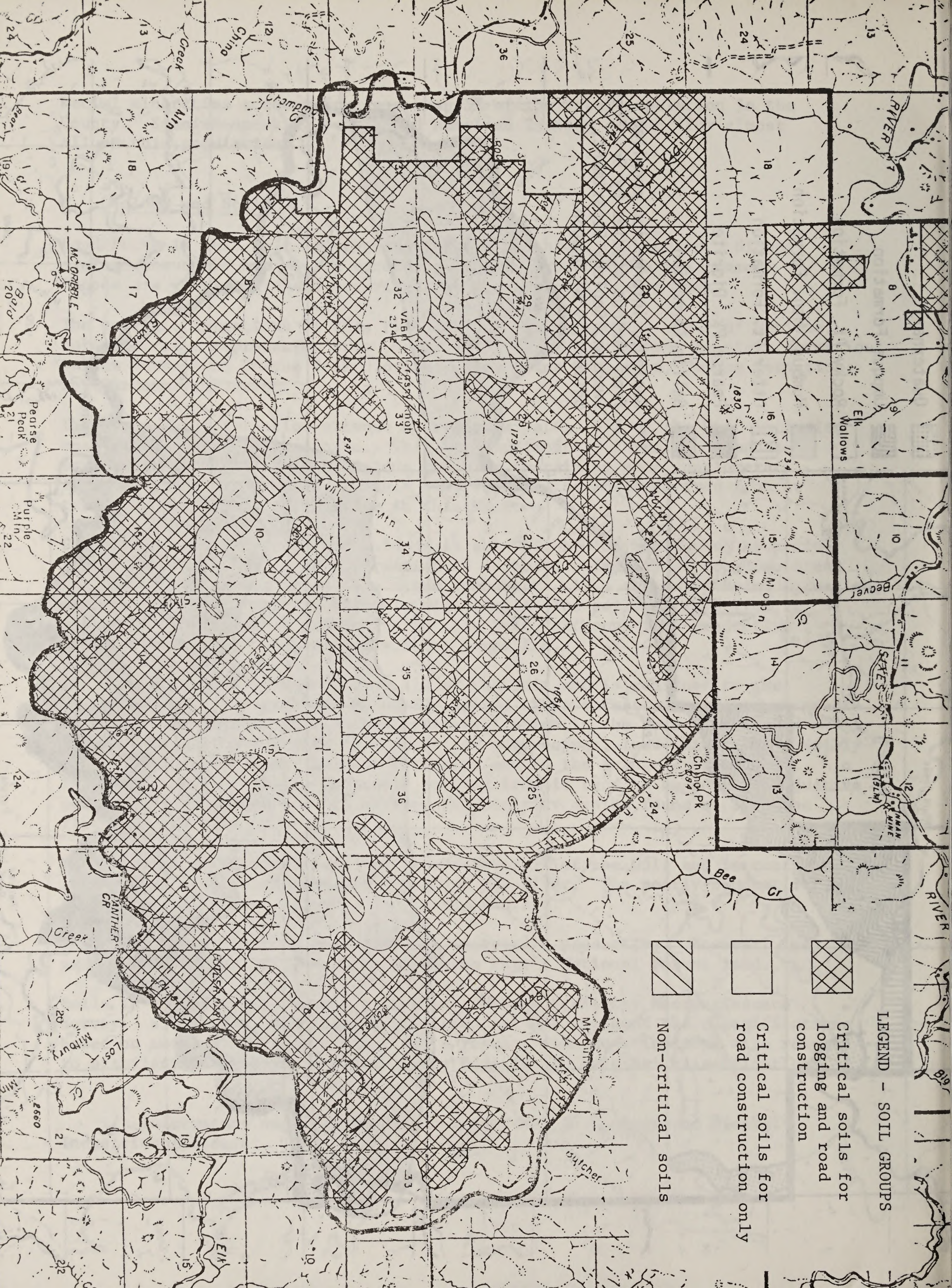
Soils in the Unit were mapped during the Cutbank Stability Reconnaissance Survey. Since then, the Forest Soil Scientist has reviewed the classifications based on more on-the-ground data. As a result, some modifications with respect to stability and erosion potential were made in the original classifications.

^{1/} Information supplied by Oregon Department of Geology and Mineral Industries geologist.



* Geologic information compiled from various studies by Dr. Fred Swanson, Geology Department, University of Oregon.

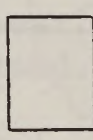




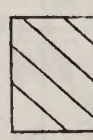
LEGEND - SOIL GROUPS



Critical soils for logging and road construction



Critical soils for road construction only



Non-critical soils

Some 90% of the soils on National Forest land in the Unit are classified as "critical soils". This means that the erosion potential is high and/or the stability class is unstable to highly unstable. The remaining 10% are moderately stable and have a moderate erosion potential.

Basically, the non-critical and less-critical soils are found along ridgetops while the most critical tend to be located lower on the slope and particularly near water courses. Therefore, a ridgetop road system would tend to avoid the most critical soils. This will tend to minimize accelerated soil erosion and to keep existing roads in place.



Unstable Soils

A rock mulch surface layer is characteristic of almost the entire Unit. The layer varies in thickness from several inches to several feet and in size from pea gravel to cobbles. Typical rock mulch conditions are 1-2 inch rocks to a depth of 6-10 inches. Usually, some soil fines and organic matter are mixed in with the rocks. Networks of fine rootlets bind this layer together in most areas of existing surface stability. Where this rootlet network has been badly damaged or destroyed or where other factors have induced surface instability, dry ravel and debris avalanches are continuing problems. In these areas, and particularly on southerly exposures, rehabilitation usually is a slow process, being aggravated by the continual surface movement.

Whatever the land use allocation in this Unit, management must be oriented toward minimizing accelerated soil erosion. This will require high quality roads designed and constructed to minimize impacts, suspension of logs during yarding operations, directional falling, and prohibition of broadcast burning as a slash abatement procedure on most of the area. In the limited number of instances where broadcast burning will be considered, agreement must be reached among the appropriate experts, including the Watershed and Fire Management staff, the Fishery Biologist, and the Silviculturist. Under all circumstances, the Forest's Soil Management Policy will be an overriding consideration.

G. Fisheries

The Mt. Butler-Dry Creek Planning Unit is rich in aquatic resources. The Unit covers portions of two major coastal watersheds, Elk River and Sixes River. Elk River borders the area on the south, and several of its tributaries, including Rock Creek, Anvil Creek, Red Cedar Creek, and Butler Creek drain about 60% of the National Forest lands in the Unit. Sixes River crosses sections 8 and 9 (T. 32 S., R. 14 W.) along the northern border of the Unit, and Dry Creek, a major tributary of the Sixes River, drains the remaining 40% of the National Forest land in the north end of the Planning Unit. A total of 194 miles of perennial and intermittent streams dissect the area.

Both Elk River and Sixes River are large streams, with watershed areas of about 94 and 129 square miles, respectively. The maximum recorded discharge of Elk River between October 1967 and June 1970, was 14,300 cubic feet per second (cfs) on December 21, 1969, and the minimum was 48 cfs on September 10, 1969. The maximum recorded flow on Sixes River during the same period was 23,800 cfs on December 21, 1969, with a minimum of 18 cfs on August 18, 1968. Higher maximum flows from Sixes River have been attributed to extensive timber harvest in that drainage. About two-thirds of the Sixes watershed is privately-owned and virtually all old growth timber has been removed from the area. Comparatively little timber harvest has occurred in the Elk River drainage.

All streams within the Planning Unit have been classified under the U. S. Forest Service, Region 6 four level system, based on water use, fishery resources, and the potential impact each stream has on the quality of downstream waters. Class I and II streams are used either for domestic water supply, have important fishery resources, or flow enough water to have a major impact on other Class I or II streams. Class III and IV streams are smaller, do not have important fishery resources, and on an individual basis, do not flow enough water to have a major impact on Class I and II streams. Stream mileage under Federal ownership in each classification within the Planning Unit is listed in Table 1.

The Region 6 Streamside Management Unit (SMU) guidelines require varying degrees of protection for each class of stream. Management practices along Class I and II streams require that timber be felled away from streams, logs not be yarded across streams, shading vegetation be left, streams be cleared of any debris resulting from logging, and roads be designed and located to minimize sedimentation. Management practices along Class III and IV streams are concerned primarily with preventing soil movement, maintaining satisfactory downstream water temperatures, and preventing debris from entering higher class waters downstream.

Table 1. Mileage of streams in each Streamside Management Unit Class, Under Federal Ownership, in the Mt. Butler-Dry Creek Planning Unit.

Stream Class	Elk River	Sixes River	Total
I	22.1	7.5	29.6
II	13.5	14.0	27.5
III	7.1	7.0	14.1
IV	76.9	46.0	122.9
Totals	119.6	74.5	194.1

Many streams that originate within, or traverse through, the Unit contain large populations of anadromous salmonids. Four species, including chinook salmon, coho salmon, winter steelhead, and sea-run cutthroat, totaling over 27,000 adults enter Elk and Sixes Rivers on a spawning migration each year (Table 2). Many of these fish do not spawn within the Planning Unit, but all are subject to land management practices that occur there.

Table 2. Estimated Spawning Escapement for Populations of Anadromous Salmonids in Elk River and Sixes River, 1972.

River	Chinook <u>1/</u>	Coho <u>2/</u>	Steelhead <u>2/</u>	Sea-run Cutthroat <u>2/</u>
Elk	12,100	800	3,500	2,800
Sixes	2,500	300	2,500	3,000

1/ Personal communication, Dr. P. Reimer, Oregon Fish Commission.

2/ Oregon State Game Commission, Environmental Investigations, South Coast Basin, 1972.

Elk River and Sixes River sustain important sport and commercial fisheries. Sport fisheries for anadromous salmonids total over 35,000 man-days effort annually, with a harvest of about 24,000 fish, and an annual net value of over \$945,000. Catch, effort, and net economic values for salmon, steelhead, and cutthroat are presented in Table 3. Estimates in Table 3 are based on recent studies by Brown, et al., (1972), 1/ indicating that steelhead anglers in Oregon average a net economic benefit of \$20 per fishing day, studies by Mathew and Brown (1967), 2/ indicating that in Washington a net value of \$28 per angler day should be considered an absolute minimum for evaluating

1/ Brown, William G., and Ashok K. Singh and Jack A. Richards. 1972. Influence of improved estimating techniques on predicted net economic values for salmon and steelhead. MS, review draft. Oregon State University, pp26.

2/ Mathews, Stephen B., and Gardner S. Brown. 1970. Economic evaluation of the 1967 sport salmon fisheries of Washington. Wash. Dept. of Fisheries, Technical Report 2.

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UNITED STATES DEPARTMENT OF AGRICULTURE
FOREST SERVICE

Siskiyou National Forest
P. O. Box 440, Grants Pass, OR. 97526

May 20, 1976
8400



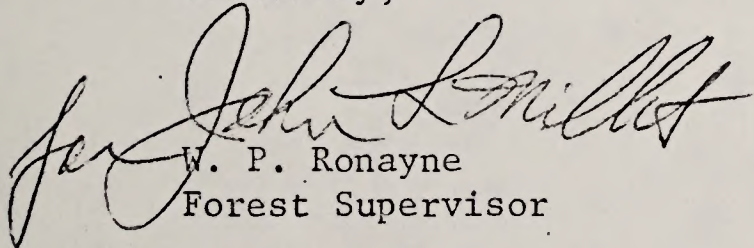
Dear Reviewer:

Under provisions of Section 102(2)(c), Public Law 91190, the National Environmental Policy Act of 1969, we have prepared a Final Environmental Statement for the Land Use Plan on the Mt. Butler-Dry Creek Planning Unit, Siskiyou National Forest.

The 22,100 acre Planning Unit lies in the northwest corner of the Siskiyou National Forest, beginning just 4 air-miles east of the coastal town of Port Orford, Oregon.

This document was prepared following review and full consideration of all comments received on the Draft Environmental Statement issued in 1975. In conformance with the National Environmental Policy Act of 1969 and Council of Environmental Quality (CEQ) guidelines, a final decision on the plan can be made 30 days after transmittal of the document to CEQ.

Sincerely,


W. P. Ronayne
Forest Supervisor

Enclosure

salmon fisheries threatened by alternative resources uses, and data on catch per unit of fishing effort in southwest Oregon waters collected by the Oregon Fish Commission and the Oregon Wildlife Commission. Estimates of sport angler effort in southwest Oregon average 2.2 days per steelhead and 1.3 days per salmon. It is assumed that the net daily value of the cutthroat fishery is equivalent to that of the steelhead fishery.

Table 3. Catch, Effort, and Net Value of Sport Fisheries for Anadromous Salmonids in Elk and Sixes Rivers, 1972.

River	Species	Harvest	Angler-Days	Total Net Value
Elk	Chinook	17,545	22,080	\$638,640
	Coho	504	655	\$ 18,340
	Steelhead	1,540	3,388	\$ 67,760
	Cutthroat	300	660	\$ 13,200
	Totals	19,889	26,783	\$737,940
Sixes	Chinook	3,625	4,712	\$131,950
	Coho	87	113	\$ 3,160
	Steelhead	1,200	2,640	\$ 52,800
	Cutthroat	459	990	\$ 19,800
	Totals	4,362	8,455	\$207,710
Elk and Sixes Rivers Total Sport Value				\$945,650



Elk and Sixes Rivers contribute a significant number of salmon to off-shore commercial fisheries of Oregon and California. The Oregon Fish Commission has estimated that three coho salmon are harvested by commercial and sport fisheries for each adult fish that returns to coastal rivers to spawn. The 3:1 catch/escapement ratio is based on recovery of marked salmon reared as juveniles in Fish Commission hatcheries. Studies by the National Marine Fisheries Service indicate that catch/escapement ratios for chinook salmon in southcoast Oregon waters average 5:1. About 71 percent of the catch is taken commercially and 29 percent by sport anglers, either offshore or in the rivers. Based on the above data, the two rivers provided approximately 51,830 chinook and 1,917 coho to the commercial fishery in 1972. Chinook in the catch averaged 10.2 pounds (dressed weight) in 1972, and coho averaged 5.9 pounds per fish. The estimated value of the fishery, based on prices paid to fishermen for their catch in 1973 exceeds \$590,000 (Table 4).

Table 4. Estimated Numbers and Value of Salmon from Elk and Sixes Rivers taken by Commercial Fisheries, Figures Based on 1972 and 1973 Fishing Seasons.

River	Species	Estimated Catch	Average Wt. <u>3/</u>	Total Pounds	Value Per Pound <u>4/</u>	Total Value
Elk	Chinook <u>1/</u>	42,955	10.2	438,141	\$1.10	\$481,960
	Coho <u>2/</u>	1,704	5.9	10,053	\$0.90	\$ 9,050
	Totals	44,659		448,194		\$491,010
Sixes	Chinook <u>1/</u>	8,875	10.2	90,525	\$1.10	\$ 99,580
	Coho <u>2/</u>	213	5.9	1,256	\$0.90	\$ 1,130
	Totals	9,088		91,781		\$100,710

Elk and Sixes Rivers Total Annual Commercial Value \$591,720

1/ Based on spawning escapement for 1972, Fish Commission

2/ Source: Environmental Investigations, South Coast Basins, Game Commission

3/ Source: Oregon Fish Commission, 1972 average.

4/ Prices paid to Oregon fishermen, July 1973.

The commercial fishery value of Elk River is increasing rapidly as a result of a large scale fishery enhancement program by the Fish Commission. Releases of chinook smolts from Elk River Hatchery, beginning in 1969, had nearly tripled the run of fish returning to the river by 1972. When adults return from releases made in 1970 and 1971 it is estimated that the run will peak at about 21,000 fish in 1974. If the catch:escape-ment ratio remains constant Elk River will provide about 105,000 chinook to commercial and sport fisheries in 1974.



In addition, in recent years the Hatchery has provided nearly, 1,000,000 chinook smolts for release in the Coos River. However, insufficient data exists to judge the effectiveness or value of the program at this time.

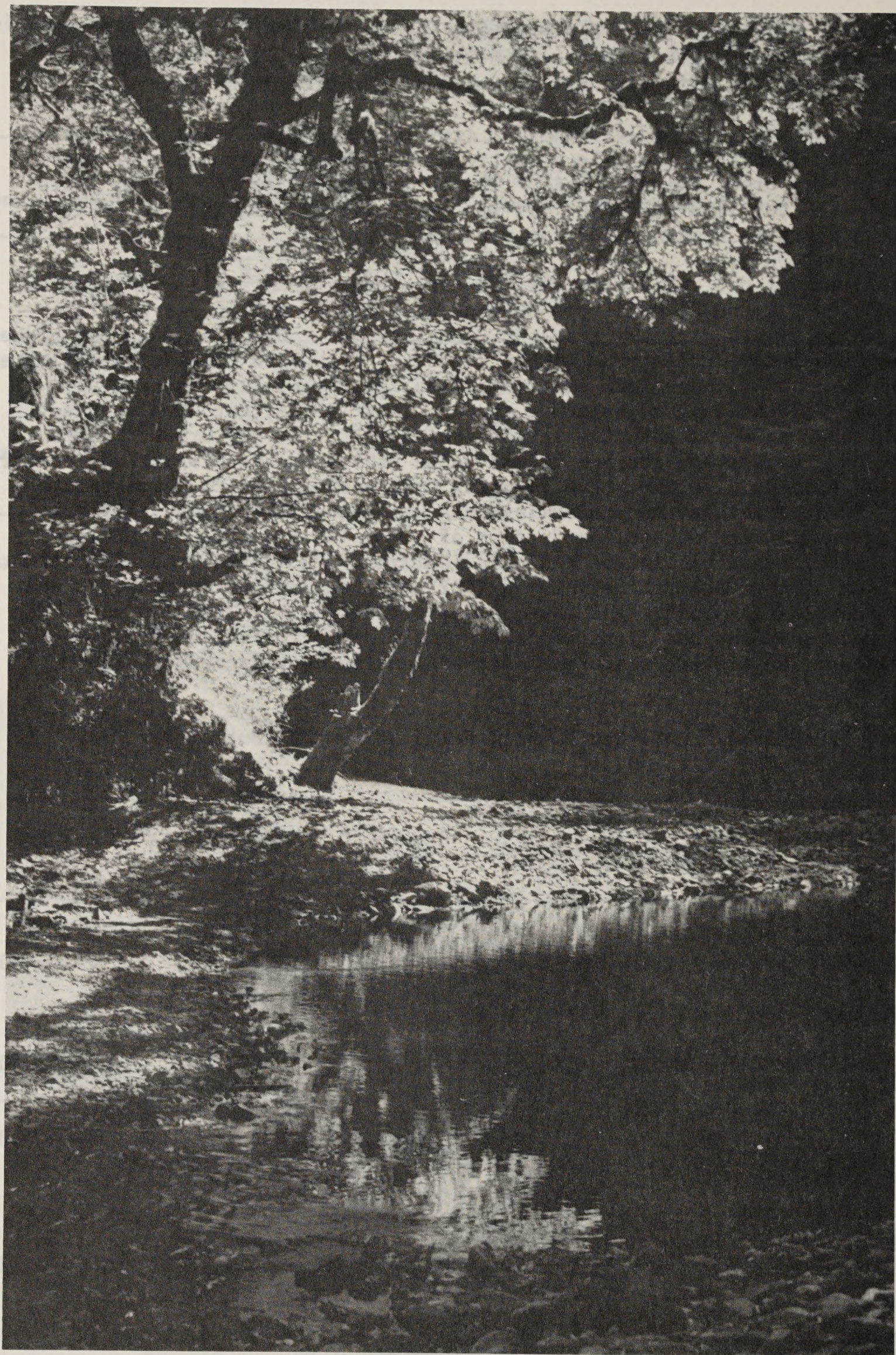
Elk River Hatchery, valued at \$834,000 (replacement value 1973), is located on Elk River less than one mile downstream from the west boundary of the Mt. Butler-Dry Creek Planning Unit. The operating budget for fiscal years 1974 and 1975 totalled \$224,000. It was estimated that in 1973 the value of the hatchery to Oregon fisheries would be \$402,000.

The total annual net value of sport and commercial fisheries for anadromous salmonids in Elk and Sixes Rivers exceeds \$1,537,000, but only a portion of the value arises directly from the Planning Unit. Dry Creek has the highest value for an individual stream within the Unit. The Fish Commission estimates that 65 percent of the salmon entering Sixes River annually spawn in Dry Creek, and USFS biologists estimate that at least 25 percent of steelhead and cutthroat spawning annually in the drainage utilize Dry Creek. Based on the above estimates, the net annual value of Dry Creek to sport and commercial fisheries exceeds \$170,000. The Planning Unit encompasses 22 percent of the Elk River watershed and, assuming that water quality and quantity are the factors limiting natural production of salmonids and that production of water from lands within the basin is nearly evenly distributed, approximately 22 percent of the total fishery value (\$271,000) can be attributed to lands within the Planning Unit. The assumptions are defensible based on knowledge of the watershed and the fisheries resource. The estimated total annual net value of the fishery resources of the Planning Unit exceeds \$441,000 (Table 5). ^{1/}

Table 5. Estimated Annual Net Fishery Value of the Mt. Butler-Dry Creek Planning Unit, 1973.

Segment of Planning Unit	Salmon		Steelhead (Sport)	Cutthroat (Sport)	Total Value
	Commercial	Sport			
Sixes drainage (Dry Creek)	\$ 64,460	\$ 87,820	\$13,200	\$4,950	\$170,430
Elk drainage (Rock Cr. to Butler Cr. and mainstem)	\$108,230	\$144,540	\$15,040	\$2,930	\$270,740
Totals	\$172,690	\$232,360	\$28,240	\$7,880	\$441,170

^{1/} Due to differences in the nature of the resources, the extraction methods employed, and the benefits received, the net annual value for fisheries is not directly comparable with either the net or gross values for timber.



Dry Creek

Land management activities within the Planning Unit potentially could have a large negative impact on fishery resources within the Unit. Fishery resources downstream from the Unit also could be negatively impacted from activities within the Unit. For example, substantial amounts of accelerated sedimentation and/or significantly elevated water temperatures potentially could seriously damage valuable aquatic resources downstream, including a \$946,000 per year sport fishery, a \$592,000 per year commercial fishery, and a Fish Hatchery producing over \$400,000 of benefits to Oregon fisheries each year.

Salmon and trout have restrictive and specialized habitat requirements. They require water rich in oxygen, with maximum temperatures preferably below 65°F., low turbidity, and near neutral pH. The supply of water must be adequate at specific times (fall, winter, or spring) for spawning, and generally throughout the year for rearing.

Anadromous salmonids also require clean gravel ranging from 1/4 to 4-inches in diameter for spawning. Chinook prefer the larger diameter materials, while coho, steelhead, and sea-run cutthroat prefer progressively smaller sizes. Gravels used for spawning must be relatively free of sediment and not compacted. Sediment in gravel can reduce survival of eggs and fry by decreasing supplies of dissolved oxygen available for respiration and restricting emergence of recently-hatched fry.

The greatest production of salmonids occurs in a habitat with a balanced relationship between riffles and pools. Young trout generally prefer riffle areas while juvenile chinook and coho prefer quiet water in pools, but also utilize riffles. Both riffles and pools produce an abundance of invertebrate fish organisms and both provide cover.

Anadromous fish must migrate from freshwater to the ocean and return to spawn in freshwater to complete their life cycle. Any restrictions to passage of adults upstream, or juveniles downstream, may limit anadromous populations.

Timber management in the Mt. Butler-Dry Creek Unit will be difficult because of the steep and unstable terrain of the area. A substrate of rock mulch covers most of the Unit, and slopes frequently exceed 100 percent. Timber harvest with conventional equipment and road construction already has been conducted along Butler Creek in the eastern end of the Unit and in the recently-acquired section 36 (T. 32 S., R. 14 W.,). The environmental impact of these operations was unacceptable from a fisheries standpoint. Sedimentation and raveling rock mulch slopes in Butler Basin seriously damaged the fishery values of Butler Creek, a major tributary of Elk River, and also caused significant sedimentation in the mainstem of Elk River. Similar problems occurred in the headwaters of Dry Creek after removal of timber from section 36. However, in recent years more sophisticated road construction and timber harvest techniques have been proven successful elsewhere on the Siskiyou National Forest. These applications have demonstrated that road construction and timber harvest activities need not result in serious problems of this nature.

Any management practices which substantially increase sediment yield in streams of the Unit, and ultimately in the mainstem of Elk and Sixes Rivers downstream, will have a negative impact on the value of the aquatic resources. Chronic sedimentation and turbidity destroy spawning areas by occluding and compacting gravels, and reduce populations of fish food organisms and subsequently the fish populations themselves.

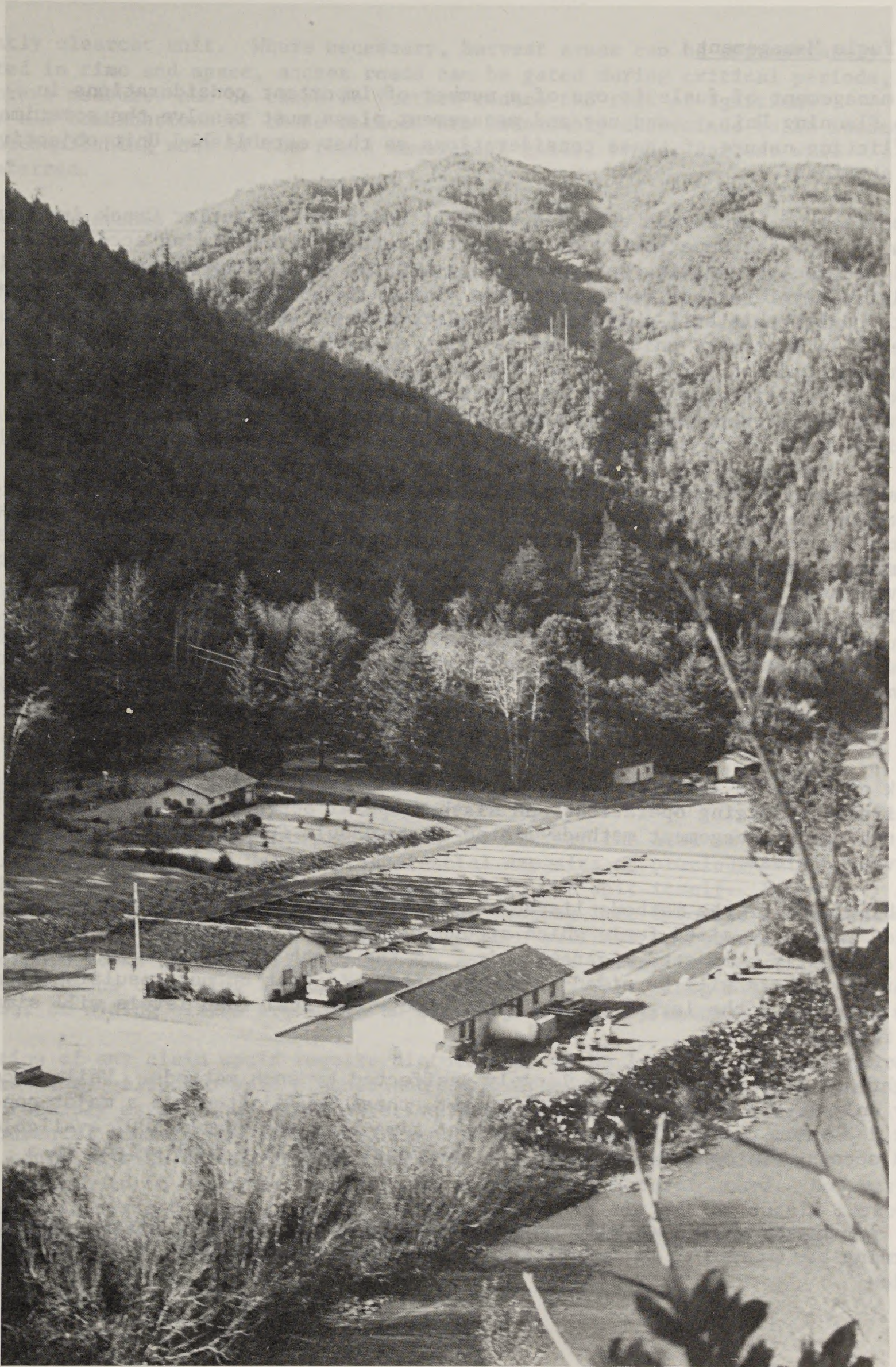
An even greater negative impact will occur if management activities result in significantly increased temperatures in the mainstem of Elk and Sixes Rivers during the critical low water period of the year.

Elk River Hatchery presently derives its water supply from the mainstem of Elk River. In summer, water quality in Elk River frequently becomes marginal for hatchery operations by virtue of high water temperatures. Temperatures of 70°F. + are not uncommon, and when combined with lowered dissolved oxygen and increased disease virulence, young salmonids rearing in the hatchery are placed under great stress. As long as Elk River is used as the water source for the fish hatchery, water quality in this river must be maintained or enhanced if the hatchery is to continue to make a significant contribution to Oregon fisheries. Any significant increase in water temperature in Elk River, from streams originating in the Planning Unit or elsewhere, could jeopardize hatchery operations.

Wild populations of salmon, steelhead, and cutthroat that rear in lower Elk River are just as dependent upon water quality in the mainstem as the hatchery. Populations of anadromous salmonids rearing in this area will decline if temperatures in the mainstem increase significantly.

The situation is as serious in Sixes River. According to Dr. P. Reimers of the Fish Commission, historically the runs of fish in Sixes River were much larger than those occurring today, and most of the decline has taken place in the last 30 years. Spawning by salmon and steelhead formerly occurred in the mainstem, but this is no longer true. Several factors could have contributed to the decline, but the most important is believed to have been extensive logging (mostly on private land) within the watershed. Harvest of trees along most of the river and its tributaries has increased solar heating of the water in summer with subsequent reduction in suitable rearing areas for juvenile salmonids. Temperatures in lower Sixes River frequently reach 82 to 83°F. in summer - lethal levels for salmonids. Dry Creek and the South Fork Sixes, where little timber harvest has occurred, support most of the remaining runs in Sixes River. Any management activities which significantly reduce water quality in Dry Creek could seriously damage the remaining anadromous fishery resources of the Sixes watershed.

To protect the aquatic resources and fragile watersheds of the Mt. Butler-Dry Creek Planning Unit during any timber harvest, the management plan should utilize the most sophisticated techniques available for road construction and logging. Should timber harvest be planned, initial entry should be completed at a conservative rate. The miles of road should be minimized and broadcast burning of slash prohibited in most areas. Under all circumstances the S.M.U. policy should be closely adhered to.



Elk River Fish Hatchery

H. Fuels Management

The management of fuels is one of a number of important considerations in this Planning Unit. Land use and management plans must resolve the sometimes-conflicting nature of these considerations so that established Unit objectives are attained.

Comparison of burned and unburned clearcut units in the Butler Creek drainage clearly show the superiority of the latter method in minimizing accelerated soil erosion, preserving soil surface stability, protecting streams and achieving satisfactory levels of regeneration in this Unit.^{1/} The more recent, unburned units have stable soil surfaces and are producing a healthy crop of young trees. In contrast, units burned as early as 1960 remain poorly stocked with regeneration. Excessive soil erosion and continual raveling of the rock mulch surface continue to plague management efforts on these units. Such problems resulted from the destruction of the small root mass which held the rock mulch surface together in these units prior to broadcast burning.

Clearly, the prohibition of broadcast slash burning in most of this Unit is essential to the attainment of sound forest resource management as expressed in the objectives established for the Planning Unit. Different combinations of several alternate fuels management methods will be relied on in the various harvest units. These are expected to accomplish an estimated 60-70% of the fuels management goals. These methods include: uphill felling; yarding of unmerchantable materials (YUM); burning of YUM piles on landings; leaving some hardwoods stand in clearcut units (this procedure will also have silvicultural merit in some areas); gating of access roads leading to particularly hazardous areas; and appropriate location of harvest areas in terms of both time and space.

Risk of wildfire ignition is low in this area, causes being confined almost entirely to logging operations and slash disposal operations. Combinations of the fuels management methods listed above should further reduce risk in harvested areas.

Combinations of the methods listed above will eliminate most of the medium-sized and large-sized fuels which account for 85-90% of the total fuel load on a recently harvested clearcut unit. In the event of wildfire ignition, control efforts will be aided by the reduction in heat output resulting from the removal of the larger-sized fuels. Long-term fuel load levels will similarly be reduced.

Light and fine fuels will be largely unaffected by such methods. While accounting for only 10-15% of the total fuel weight, these fuels often are a major concern for 2-3 years in this area. During that time they are nearly 100% available and account for as much as 65-70% of the total available fuel weight in a

^{1/} However, on many other areas of the Siskiyou National Forest, broadcast burning has proven to be beneficial in achieving satisfactory levels of regeneration.

recently clearcut unit. Where necessary, harvest areas can be appropriately located in time and space, access roads can be gated during critical periods, and other measures can be taken to further reduce the risk of ignition. Where all combinations of these methods are reasonably determined to be inadequate for accomplishing most of the fuels management goals, timber harvest will be deferred.

I. Land Ownership

Planning Unit boundaries include 22,100 acres of National Forest land and 4,200 acres on non-National Forest, mostly privately-owned, lands. Almost all of these latter acres are located along the northern and western ends of the Planning Unit.

Original Forest Service boundary-adjustment plans would have established a boundary retraction area covering nearly 2,000 acres of National Forest land. These acres would have been available for exchange should offers be made. The proposed benefits included: simplification of land ownership patterns; creation of more compact management units; reduction of boundary miles; and creation of land available for exchange for areas of high priority.

Subsequent multi-discipline studies have found that it is imperative to retain section 19 (T. 32 S., R. 14 W.) which contains much of lower Dry Creek. In fact, it is recommended that all National Forest land in the Unit be retained except for the three scattered parcels in sections 8 and 17 (T. 32 S., R. 14 W.). Further, it is recommended that the Forest Service acquire the 200 acres of highly sensitive lands bordering the Elk River in section 16 (T. 33 S., R. 14 W.). Such actions must be accomplished to minimize the environmental impacts of the PROPOSED ACTION and its alternatives.

J. Minerals

Although a colorful mining history exists for much of the area in the general vicinity of the Planning Unit, no substantial deposits of precious metals or other valuable minerals are known to exist in the Unit itself. However, mineralization in the form of precious metal-bearing lode deposits in association with copper, lead, zinc, and possibly other sulfides may occur in the metamorphic rocks of the Galice Formation and in the Pearse Peak diorite - both formations occurring at the southern end of the Unit along Elk River. A number of mining claims are known to exist--particularly along Elk River.

Operation of any claim would require disturbance of the land and the vegetation on that land. Although well-planned and implemented operations (as required under recently established administrative mining regulations) can minimize environmental impacts, at least some temporary impacts would occur. This could conflict with forest resource management objectives-particularly in areas designated to essentially remain in the existing natural state. However, careful analysis and planning prior to commencement of activities should improve coordination between parties and minimize potential conflicts with management objectives.



Should a development alternative be chosen, some of the suitable common material deposits located on or near the ridgetop will be developed for road surfacing material. Extreme care will have to be exercised in these areas in order to minimize damages to the soil, the watershed, and other resources.

K. Recreation and Aesthetics

Recreation composite plans and other informal land use studies have shown recreation use in southwest Oregon, and particularly on the Siskiyou National Forest, to be strongly oriented toward water.^{1/} This is especially true for this Planning Unit. Elk River, bounding the Unit on the south, is characterized by small, clear, still pools broken by short stretches of white water.

It has an established fisheries resource which is readily accessible by road. Recreation use within the Unit is generated mainly by this river and Dry Creek. Computed recreation use, other than in developed sites, shows about 20 vehicles per day, spring through fall, or about 100 PAOT (persons at one time) per day.

Dry Creek, draining the northern portion of the Unit, is primarily accessible only by foot, although evidence of off-road vehicle use can be found on the gravel bars upstream for over 1 mile. The stream is characterized by long pools, clear water, falls, chutes, and riffles. The streambanks alternate from gentle to steep with access upstream generally easy along the stream bed to the edge of section 29 at a bench called "Velvet Flat." Along this lower 1-3/4 miles, there seem to be small flats at each bend of the creek. However, upstream and just beyond Velvet Flat, the creek enters a generally steep canyon with vertical walls and waterfalls frequently encountered.

There are opportunities to make the resource along Dry Creek available to more people without substantial degradation of a high quality experience. It appears possible to build a minimum impact hiker trail within a corridor along Dry Creek. This could run from the National Forest boundary near the creek's mouth to the main ridge dividing the Elk River and Sixes River watersheds. Spurs to this main trail also seem possible.

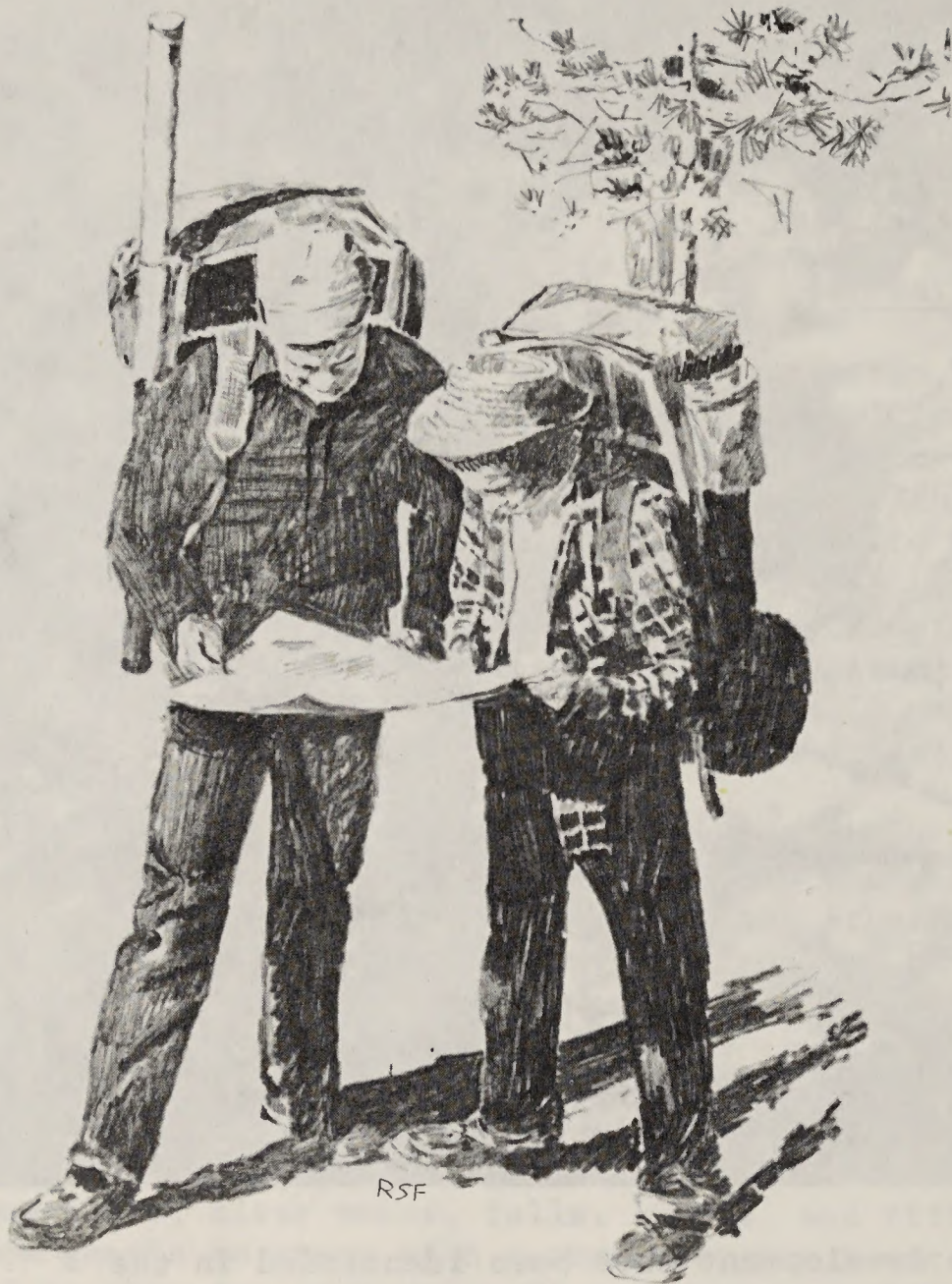
^{1/} Oregon Outdoor Recreation, 3rd edition("SCORP"), 1971. Oregon State Highway Division, Salem.



Ten flats suitable for primitive development have been identified in the lower 1-3/4 miles of Dry Creek. However, upstream from the last of these, Velvet Flat, the opportunities are much more limited. In striving to maintain the primitive character of the creek area, few of the suitable sites would receive even primitive development (development level 1 or less).

In addition to the existing opportunities for foot trail and other primitive developments along Dry Creek, opportunities also exist for ridgetop trails. The best of these appear to be on the main ridge dividing the Elk and Sixes watersheds and on the ridges between this divide and Elk River. Scenic vistas of the rugged topography and various vegetation types can be found in a number of places and Elk River is the primary feature at the lower end of any of these possible routes.

Of the current recreation use in the Planning Unit, almost the entire amount can be attributed to Elk River. This dominance is likely to continue in the future because Elk River is generally easily accessible from the parallel road and because the only areas suitable for developed campgrounds are along this river. However, development of hiker trail systems and road loop drives will increase recreational opportunities in other parts of the Unit.



Butler Bar campground is the only existing developed campground immediately adjacent to Elk River. It is a small development, containing only 12 family units but it receives about 4,000 visitor-days use each year. There are other areas having potential for development along the river. These include a large flat north of the river at Sunshine Creek and a number of smaller flats along the road. The large flat may contribute the most by being left relatively undeveloped. The smaller flats (south of Elk River and just outside the Unit boundary), offering a variety of sizes, shapes, and vegetative types, may be best suited to minimum development camps (development level 2 or less) designed for one party per flat.

Driving for pleasure is another generator of recreation use as well as a past-time for users of recreation sites. Most of this activity occurs along Elk River on Forest Service Road No. 325. The foreground

area along and adjacent to this road is almost completely healed with the rock surfaces and cut slopes vegetated. Stream areas are vegetated with hardwoods which lend brilliant fall color. A high degree of variety exists in the seen area on the slopes above and north of Elk River. This variety includes sharp ridges, rock outcroppings, silver-colored snags, and an interwoven maze of brushfields and timber stands.

The characteristics of the Planning Unit make it almost entirely unsuited to off-road vehicle (ORV) use. A Forest ORV Plan currently is under preparation. It will designate one of three area classifications with respect to ORV use for each area of the Siskiyou National Forest. The classifications are: 1) areas open to ORV use; 2) areas closed to ORV use; and 3) areas open to ORV use at certain times of the year or under certain conditions.

L. Road Construction

Due to the rugged, steep terrain in the Planning Unit, road construction will be difficult and expensive. Although slopes are often less steep near the ridgetops, the average slope for the entire Unit is approximately 80%. Rock faces and outcrops are commonly encountered and a rock mulch surface is characteristic of virtually the entire Unit.

The same characteristics which require expensive road construction techniques will also increase maintenance costs—even on the most carefully designed and constructed roads. However, experience with recently-constructed roads in terrain similar to that in the Unit elsewhere on the Siskiyou National Forest, demonstrates that roads can be constructed and maintained while minimizing environmental impacts at low and acceptable levels. The Dixie Creek road which runs from the eastern end of the Planning Unit to a point approximately 3 miles east is an example of a well-designed and constructed ridgetop road.

A ridgetop road system has been recognized as essential to this Unit since 1968. In 1969, the Mt. Butler Accelerated Road Plan was initiated. This plan considered a ridgetop through-route from the end of existing Road 326 on the west Forest boundary to the existing Road 326 on the southside of Mt. Butler. A P-line was staked but the project was terminated during the preliminary design stage due to the cancellation of funds for accelerated road projects. The multi-discipline Land Use Planning studies since then



A Well-Designed and Constructed Minimum-Impact Road
In Comparable Rough Terrain Adjacent to the Planning Unit.

indicate that the P-line must be relocated uphill towards the ridgetop between P-line stations 167+00 and 292+00. Relaxation of grade restrictions since 1969 makes it possible to keep the road at or near the ridgetop by using 14% grades in this section. This will reduce excavation and avoid the unstable soils which are characteristic of midslope and lower slope areas. Located on the most stable soils, both construction and maintenance problems will be reduced.

Roads in the Planning Unit will be designed to single lane standards with turnouts. The running surface will be paved and 12 feet wide with 50 to 150 feet long intervisible turnouts on the main access road (326). Other roads will have a crushed rock surface.

Geotechnical investigations prior to road design are usually able to locate areas with a substantial potential problem in the form of joint surface and small fault failures. Often, roads can be designed around these areas. Where necessary, preventative devices such as retaining walls can be constructed. However, it should be noted that joint surface and small fault failures are basically small volume failures and are thus primarily a maintenance concern.

Generally roads will be constructed at grades of 12% or less. Fifteen percent (15%) grades will be used when lesser impacts warrant them. Grades in excess of 15% will be permitted only to prevent unacceptable impacts.

Grades will be rolled. This will be instrumental in keeping roads on or near the ridgetop. It will also help minimize the number of high cutbanks.

Full bench construction (all cut and no fill) will be used on almost the entire road system in this Unit. The excavated material will be end-hauled to prevent it from creating erosion and stability problems downslope. Up to 90% of all excavated material has been recovered when barriers to catch loose earth (e.g., right of way logs, hurricane fences, or plywood fences) have been constructed and when front end loaders have been used. This operation will require that the excavated material be hauled to safe and acceptable waste storage areas. Such operations are very expensive and account for much of the high construction cost per mile in this Planning Unit.

The traditional balance cut and fill method of road construction may be used in areas where cross-slopes of less than 60% are encountered if impacts can be kept at a low and acceptable level. The primary benefit would be lower construction costs.

Alignment is another important factor because large skyline logging equipment will be used extensively in the Unit. The minimum curve radius for this equipment is about 75 feet while most log trucks can negotiate 40 feet radius curves. The larger curves will create somewhat higher cuts through small ridges and will not fit the topography as well as the smaller curves in these areas. Roads on the ridgetop will be unaffected.

Roads will be insloped with either frequent culverts or rolling dips installed (depending on the situation). Downdrains with tees or energy dissipators will be used as appropriate to eliminate the sometimes serious erosion problem which results from water falling several feet from culverts onto soil.

Outsloping roads, where appropriate, is an alternative to insloping. This technique allows sheet runoff instead of concentrating large flows of water which could be difficult to control in certain situations. Another benefit is that fewer drainage facilities (e.g., culverts, dips, energy dissipators) are required.

Ridgetop road systems eliminate most of the stream crossings encountered in midslope road construction. Where small streams are encountered, the culvert should be laid from downstream to upstream and partially below the natural stream gradient. Stilling basins at the outlet, where possible, will reduce most of the critical flow characteristics developed when natural channels are disturbed.

Quality control during construction by inspectors and engineers ensure adequate placement and installation of subdrains not designed but found necessary as wet areas are uncovered during construction. As with other construction activities, construction debris will be properly disposed as planned.

Cutslopes should not be rounded in this Unit. This will reduce shallow surface instability problems where rock mulch surfaces exist.

Newly developed areas, and particularly the new roads in the areas, contribute the major amount of sediment produced in watersheds.

Erosion control funds to accomplish the necessary erosion control measures specified in the contract are allowed for in the project appraisal. These measures include seeding and fertilizing cuts, fills, and other exposed soils--often by hydro-mulching. These measures have proven to be very successful in rapidly establishing grass cover over exposed soils and in drastically reducing accelerated erosion--especially during the first several years when the erosion potential is the greatest.

Maintenance operations after construction keep the roads operable and reduce environmental impacts to an acceptable level. These include but aren't limited to: dust abatement; debris removal; and road closures.

Dust abatement, either by pavement (as on Road 326) or by dust oil application, slows the erosion process caused by traffic, wind, and storm runoff.

Debris removal from the running surface keeps the road safe and operable. Debris removal near culverts and other drainage facilities insures their full operability.

Secondary system roads can be closed to public use by gating after timber harvest operations are completed in an area. This virtually eliminates impacts associated with wet weather use (e.g., ruts, water concentration, erosion, and cut bank failures in that order of probability). Another benefit is the reduction of maintenance costs. A final benefit is the reduction of wildfire ignition risk.

M. Timber

The 22,100 acres of National Forest land in the Unit contain an estimated net merchantable softwood timber volume in excess of 572 million board feet. It is estimated that this volume would sustain an annual yield of approximately 7.4 million board feet (MMBF).^{1/} The remaining 4,200 acres of non-National Forest lands within the Unit boundaries are almost all privately-owned. Virtually the entire acreage has been logged, leaving relatively little standing volume.

The 7.4 MMBF potential annual yield would generate a gross value exceeding \$1.6 million per year. However, the net value (stumpage value) would be much lower, reflecting the extraction and manufacturing costs. And in this difficult and sensitive Unit, logging and road construction costs will be, very high. As a result, the average annual net value of a 7.4 MMBF harvest approaches \$0.3 million.^{2/} Rapidly rising stumpage values in recent years suggest that these values are likely to increase in the future.

The primary tree species found in the Unit are Douglas-fir, western hemlock, and tanoak. Other tree species found include: Port Orford cedar; sugar pine; grand fir; knobcone pine; Pacific yew; madrone; Oregon myrtle; red alder; big leaf maple; vine maple; canyon live oak; golden chinkapin; and dogwood. A large number of other brush, herb, and grass species are also found in the various plant communities within the Unit. Several of the most important include five or more fern species; two huckleberry species; several manzanita species; and poison oak.

In general, the dominant timber species is Douglas-fir. On favorable aspects, moderate to heavy stocking levels is the rule. The typical old growth stand in these areas has 40%-70% crown closure while the typical second growth stand has 70%-100% crown closure.

The amount of conifer regeneration under the main canopy varies from none to very heavy on the favorable aspects. Hemlock is the major reproduction species--particularly in areas containing a great amount of regeneration. Douglas-fir and western hemlock regeneration sometimes appear together under the more open canopies. Some of the western hemlock and grand fir regeneration was found to contain mistletoe infestations although few heavy infestations were encountered.

^{1/} Annual yield as used in this document refers to a planning estimate of the sustainable annual yield from this Planning Unit based on present day technology, economics, and timber management practices. It should neither be confused with nor compared with the Forest's programmed annual harvest which has been calculated for and is accurate for the entire Forest only. Further, the planning estimate will do nothing to vary the current allocation of the programmed harvest to the Powers Ranger District.

^{2/} Due to differences in the nature of the resources, the extraction methods employed, and the benefits received, the net annual value for fisheries is not directly comparable with either the net or gross values for timber.

Light to moderate stocking levels predominate among conifer stands on the unfavorable aspects (S, SE, SW). However, extensive, dense brushfields and hardwood stands occupy as much as 33% of the area having these aspects. These types completely dominate the upper part of the slopes. Timbered types typically have 10%-40% crown closure with little or no conifer regeneration under the canopy. Where it does occur, Douglas-fir is the predominate species. Better stocked stands on these aspects almost always occur on the lower part of the slope where the harsh environment found higher is substantially modified.

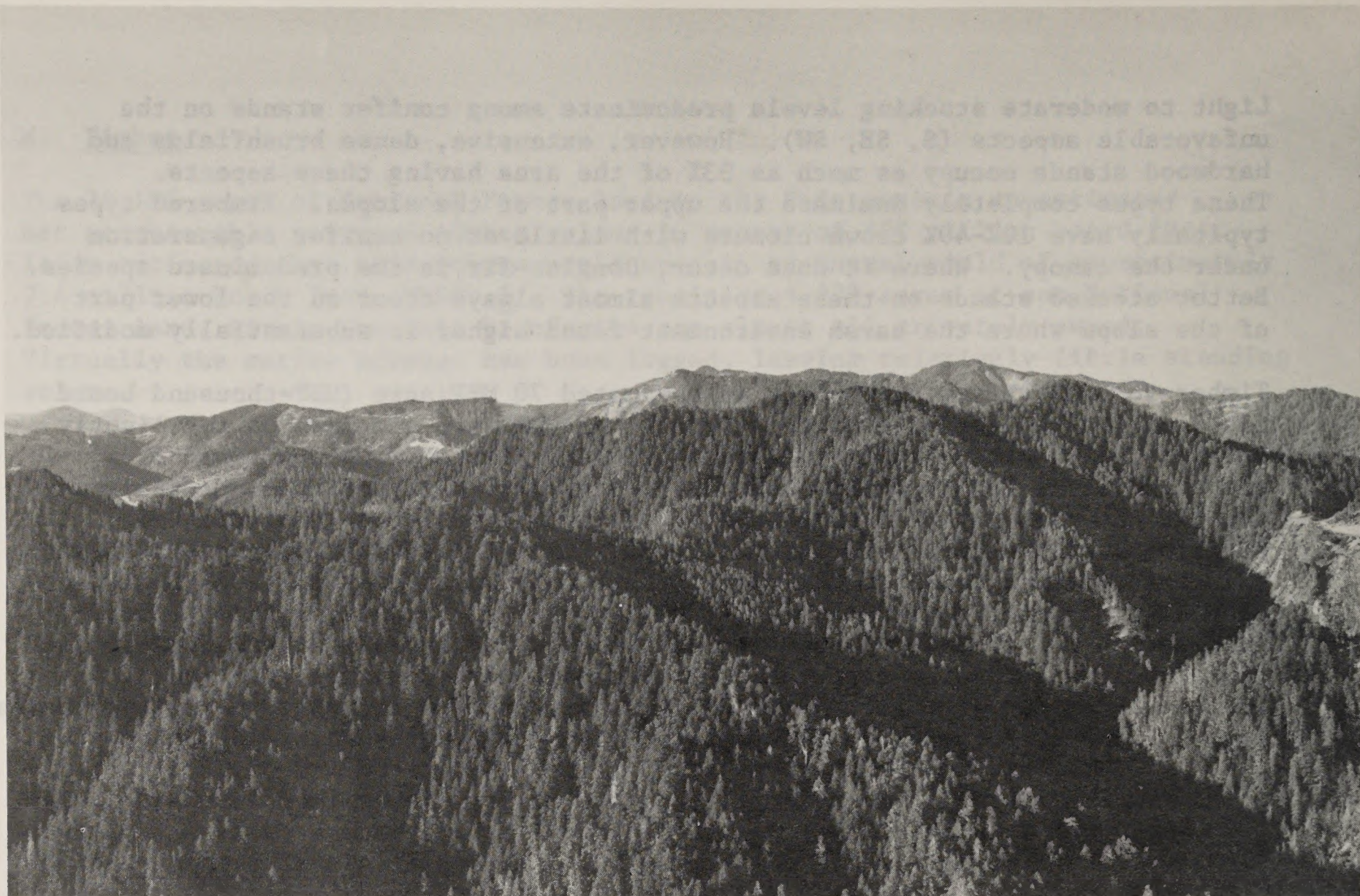
Timber volumes vary widely, from an estimated 70 MBF/acre (MBF=thousand board feet) on the well-stocked better sites to 13 MBF/acre and less on the lightly stocked and poor sites. These timber volume estimates were developed from the study of timber type maps and on-the-ground conditions. Random traverses through the Planning Unit were made to verify timber typing and to obtain additional timber data from sample plots. Some of the data gathered included: existing volumes; amount of defect; site quality measurements; basal areas; slopes; aspects; elevations; plant species observed; and other data. This information was recorded on an examination card for later analysis. The timber volume estimates computed from this data were compared with recent aerial photos and with actual timber sale harvest data and other volume estimates from similar areas before acre and total volume estimates were made.

Estimates of Acreage and Volume by Timber Type

<u>Timber Type</u>	<u>Acreage</u>	<u>Total Volume (MBF)</u>
D5=,D4=(Large old growth Douglas-fir saw-timber over 21 inches DBH, well-stocked)	1,394	91,575
D5=,D4=(Same as above except medium-stocked)	7,945	339,247
D5-,D4-(Same as above except poorly-stocked)	5,091	64,653
D3=,D3=(Small Douglas-fir sawtimber 11 to 21 inches DBH, mainly young growth, well and medium stocked)	2,354	86,956
D3- (Same as above except poorly-stocked)	95	390
D2=,D2=(Douglas-fir pole timber 5 to 11 inches DBH, well and medium stocked)	193	0
HD2,3=,=- (Well, medium, and poorly-stocked hardwoods)	2,984	0
X,XO (Existing clearcut timber sale units)	1,236	0
G,NG (Vegetative land, grass or small brush)	710	0
NR (Non-commercial rocky areas and cliffs)	21	0
W,Misc. (Water and miscellaneous)	<u>65</u>	<u>0</u>
Totals	22,088*1	582,821*2

*1 Round to 22,100 acres

*2 Approximately 10 million board feet were considered non-commercial.
572,670 MBF will be used for the volume estimate.



Representative Slopes Top: North Slopes. Bottom: South Slopes in Southern Portion of Unit

Site index is a measurement of the land's inherent ability to grow timber. It is determined by the relationship between the total height of the trees and their ages. The taller a tree can grow in a given period of time, the higher the site index and the volume produced. The average site index for all commercial forestland on the Siskiyou National Forest is 105 (meaning that the average Douglas-fir trees in a stand will be 105 feet tall at age 100 and each acre will be capable of producing as much as 60,000+ board feet under managed conditions). Although this is a relatively low figure for western Oregon, it is a relatively high figure for the entire United States. However, there is wide variation around the 105 mean.

Site index shows great variation in this Planning Unit--from very low to rather high. The average of all commercial forestland in the Unit appears to be between 110 and 115--somewhat better than the Forest average. However, the average for commercial conifer stands on favorable aspects (N, NE, NW, E, W) appears to be between 120 and 130. There are some highly productive areas with site indices ranging up to 170. In contrast, the average site index for commercial conifer stands on unfavorable aspects (S, SW, SE) appears to be between 90 and 100 with the range from 40 to 120. Brushfields and hardwood stands, found primarily high on slopes with unfavorable aspects, tend to be non-commercial in terms of potential productivity. However, some of the better hardwood sites may have site indices as high as 100-110.

Data also indicates a substantial difference between the relatively productive north side of the main east-west ridge (running from due west of Grassy Knob to the middle of section 8, T. 33 S., R. 13 W.) and the less productive south side. The average site index for the former appears to approach 130 while the latter is better described by a site index of 100. Another measurement of the land's inherent ability to grow timber, growth basal area, also indicates a substantial difference. Growth basal area at 10 rings per inch (GBA 10),^{1/} while relatively low for the entire Unit, was more than two times greater on the north side than on the south side of the ridge.

The age of the old growth Douglas-fir varies from 140 to 400 years with the median exceeding 200 years. Although some pockets of mortality (due to either wind, insects, or disease) are scattered throughout the Unit, the general stand condition is relatively good.

The age of most second growth stands falls between 75-100 years. However, there are several known 30-40 year old stands. All of the second growth stands examined appeared to be fairly thrifty with a good potential for growth at 10 rings per inch or better under intensive management. However, one of the findings that deserves further study is the relatively low basal area and GBA common to the Unit--even on many of the better sites. Limited data indicates an average coniferous basal area of only 133 in old growth stands with at least 80 ft² of basal area (range: 80 to 320). Plots taken in second growth stands show a more uniform pattern, ranging from 120 to 160 around

^{1/} Basal area is a two-dimension density measure. It refers to the surface area at 4.5 feet above the ground of the trees on a given area (usually on an acre). GBA is a measure indicating the maximum amount of basal area per acre that will result in sustained diameter growth of at least 10 rings per radial inch.

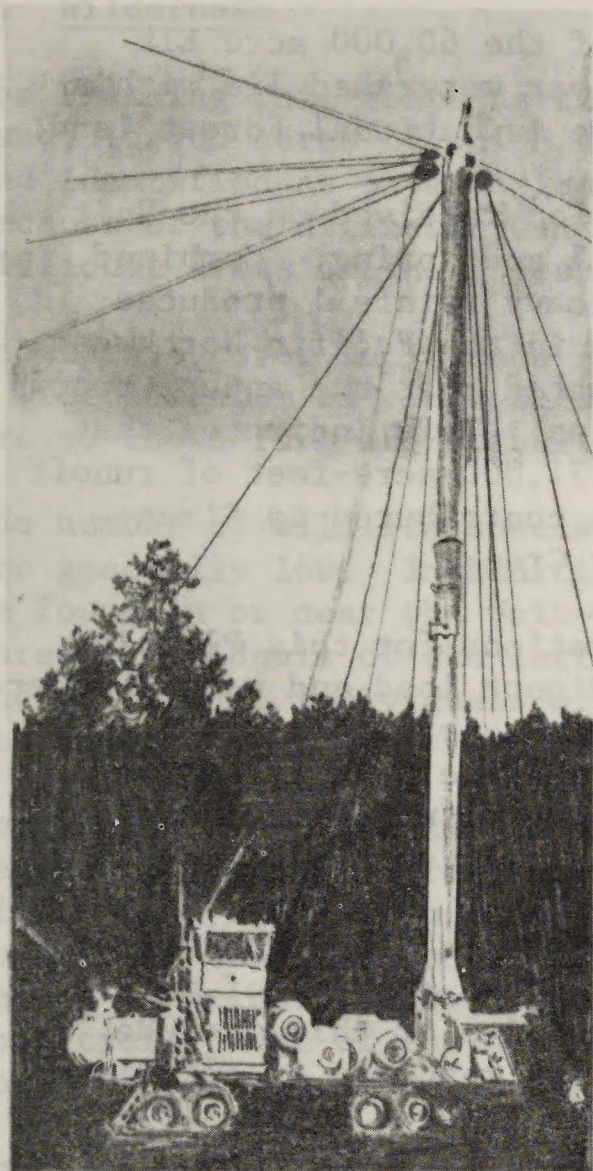
the 140 ft² basal area average. The GBA₁₀ in these plots average 116 or 83% of the total. This seems to indicate that relatively wide spacing will be required to attain 10 or fewer rings per inch growth rates on this Unit.

The historical periodic occurrence of wildfire in the Unit has left its mark on the existing timber stands and has helped create substantial future regeneration problems. Some fires undoubtedly destroyed stands over large acreages. This resulted in the establishment of well-stocked second growth stands (e.g. the well-stocked small sawtimber stands north of Dry Creek) on good sites and the establishment of dense hardwood brushfields and hardwood stands on harsher sites. Other fires obviously left part of the original stand, resulting in moderate and poorly stocked stands. Depending to a considerable extent on aspect, either conifer, hardwood, or open understories developed in these areas.

The reoccurring fires also appear to have been a major contributor to the heavy soil erosion which resulted in the rock mulch surface found throughout the Unit. The rock mulch varies in size and in depth from several inches to two feet or more. Such surfaces are often bare and devoid of either organic materials or fine soil materials on slopes with unfavorable aspects. On slopes with more favorable aspects, the mulch surface is tied together with a network of fine rootlets and contains a considerable amount of soil fines and organic materials.



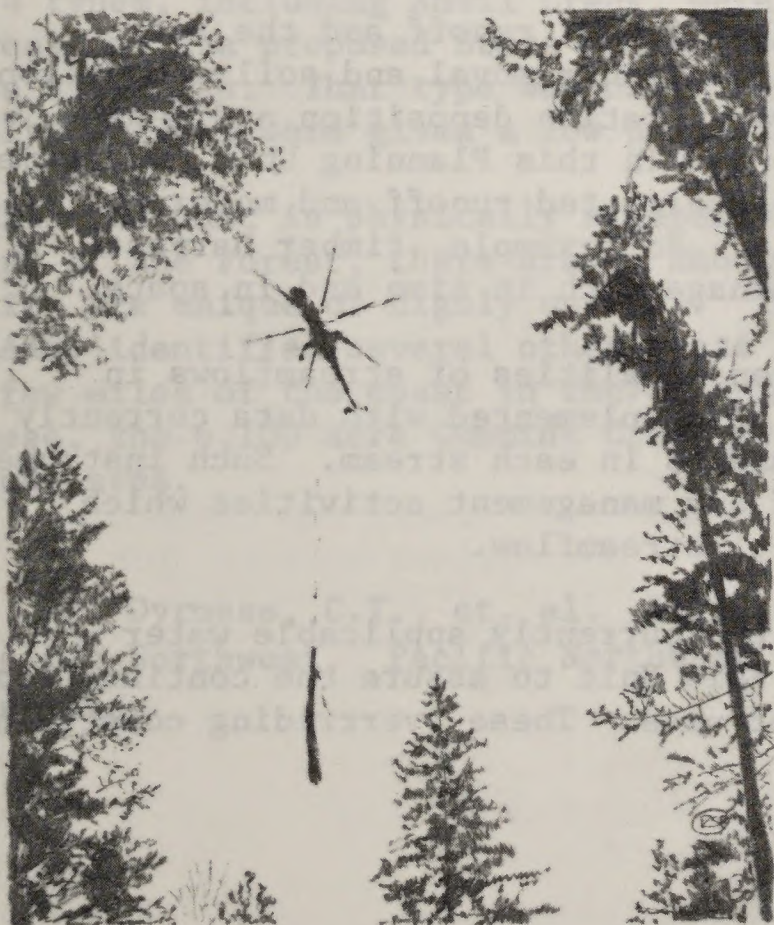
Well-Stocked Harvest Unit in Butler Creek Drainage



The rock mulch, when combined with the steep, rocky terrain, summer drought, and other factors, may cause regeneration problems in some areas. These problems will be particularly present where the fragile surface layer is disturbed to any significant extent (e.g. wildfire; broadcast burn; or ground skidding during logging operations). However, helicopter and skyline logging systems operations have shown that such disturbance can be minimized. None-the-less, relatively new planting techniques (e.g. using container-grown trees) and/or natural seeding may be required over many acres.

Heavy slash volumes from defective timber, broken logs, old growth tops, and broken hardwoods will be another problem on many acres. Disposal by broadcast burning would create serious regeneration problems on the rock mulch surface. Leaving the slash untreated would create other serious regeneration problems and also a serious fuel buildup condition. However, recently-recognized (but operational for nearly 10 years) techniques such as uphill felling (using either jacks or cable assist) have proven that breakage during felling operations in old growth timber stands can be greatly reduced. Utilization has been improved as much as 20% or more in steep,

rugged terrain while residual slash volumes have been reduced markedly. YUM (yarding unmerchantable material) operations are capable of removing most of the remaining slash volumes. Both techniques will have to be used extensively where timber is harvested in this Planning Unit.



The nature of the Unit is such that timber management and road construction activities will be accomplished with great skill and some of the most sophisticated techniques available. In addition, there are a number of quality control policies and directives which will have an overriding influence on activities in this Unit. They include: the Soils Management Direction; the Streamside Management Unit Policy; the Visual Management System; and the water quality standards established for this Unit (see appendix).

N. Water

The Unit spans two watersheds. Approximately 22% of the 60,000 acre Elk River watershed and 16% of the 82,000 acre Sixes River watershed lie within the Unit. About two-thirds of the latter percentage is National Forest land.

Almost all of the 85-90 inches of annual precipitation received on the Unit is in the form of rain which falls between late fall and spring. Combined with the soils and steep slopes of the Unit, this heavy rainfall produces a high seasonal runoff. In a study of river basins in the Pacific Northwest, the Pacific Northwest River Basins Commission estimated that the annual runoff in the area including the Unit approximates 65 inches. This indicates that National Forest lands in the Unit contribute about 71,000 acre-feet of runoff to Elk River each year. About 48,000 acre-feet are contributed to Sixes River annually--almost all of it flowing out of Dry Creek.

Water quality is one of the most important considerations for this Planning Unit. The primary variables to monitor include sediment load and water temperature. It is important to keep the level of each variable within a range satisfactory to the requirements of the fisheries resource. An excessive sediment load could completely cover the streambed gravel which is essential to the spawning of anadromous fish. This would result in serious damage to this valuable resource in both Dry Creek and Elk River. Water temperature is similarly critical to the operation of the Elk River Hatchery downstream from the Unit. High water temperatures reduce the oxygen content of water and increase disease problems with the fish. The results of this include less healthy fish and increased mortality. The entire resource in Elk River could be seriously damaged if temperatures exceed the tolerable threshold.

The timing and rate of runoff are other considerations. Large fluctuations in streamflow create problems at both extremes. Excessively high levels endanger lives and property, damage streambeds, erode stream banks, destroy spawning, and damage streamside vegetation. Excessively low levels during summer months may damage the fisheries resource and reduce the recreational potential of the stream.

Management activities can influence both the time of runoff and the rate of runoff to some degree. For example, vegetation removal and soil compaction often tend to decrease the time between precipitation deposition and runoff, resulting in greater streamflow fluctuations. In this Planning Unit, management activities should be designed to minimize accelerated runoff and moderate streamflow levels to the extent practicable. For example, timber harvest units should be dispersed throughout a drainage both in time and in space.

Existing information about the quantities and qualities of streamflows in Dry Creek, Rock Creek, and Elk River will be supplemented with data currently being collected by water monitoring instruments in each stream. Such instrumentation will also allow close monitoring of any management activities which may influence the quantity and/or quality of streamflow.

The Siskiyou National Forest has upgraded the currently applicable water quality standards for waters flowing from this Unit to assure the continuation of high quality water for fishery and other uses. These overriding constraints can be found in Appendix C.

O. Wilderness

The Planning Unit contains 22,100 acres of steep, rugged National Forest land, 16,500 acres of which are essentially uninhabited, unaltered by man, and identified as inventoried roadless area. These conditions exist primarily because of the difficulty and high cost of access and development. Less difficult areas on the Forest were developed first.

Vegetative cover includes a large variety of floral species and plant communities. A wide spectrum of plant succession stages are represented. However, there are no known rare or unusual plants in this area.

The number of wildlife species present is large but the population levels are generally low. In addition, two threatened species (State list) can be found in or near the Unit--the bald eagle and the northern spotted owl. Three individuals of the latter species were recently observed in the Unit and additional individuals of each species are believed to inhabit or utilize the Unit.

Recreation use currently is concentrated along Elk River and to a lesser degree on lower Dry Creek. There is road access to the extreme eastern end of the Unit and most of the distance to section 36 (T. 32 S., R. 14 W.), however, recreation use of these roads has been minimal. What little hiking occurs is primarily cross-country because, with the exception of the Grassy Knob trail, most of the old trails have grown over. However, access by foot could be greatly improved by trail construction or reconstruction.

Both the Anvil Creek and the Dry Creek drainages have been identified as possible locations for additional Research Natural Areas in a publication resulting from a 1973 workshop on natural area needs.^{1/} That workshop identified a possible 316 additional Research Natural Areas (RNA's) to supplement the 60 existing RNA's (several possible locations were listed for many of the types). These types were then prioritized based mainly upon how endangered areas of each type were believed to be, not upon how extensive the type is. 174 types, including Anvil Creek, were given a high priority rating. Dry Creek and the proposed Store Gulch (Hoover Gulch) Research Natural Area represent the same type. That type was one of 93 given a medium priority rating. Only 42 types were given a low priority rating.

While the Unit is physically steeper and more rugged than almost all of the rest of the Forest, there are no known ecological or geological features which are unique or highly unusual. The Roadless Area Review and Evaluation (RARE) identified several other areas in the coastal mountain range and within a few miles of the coast in the Olympic and Siuslaw National Forests. Of these, the 6,100 acre Cummins Creek area was selected as a new wilderness study area.

^{1/} Dyrness, C.T., et. al. 1975. Research Natural Area Needs in the Pacific Northwest. Pacific Northwest Forest and Range Experiment Station. Portland.

The Final Environmental Statement (FES) on Roadless and Undeveloped Areas, published during October, 1973, was the final product of the Roadless Area Review and Evaluation (RARE) process. 274 inventoried roadless areas representing 12.3 million acres were identified as New Wilderness Study Areas. The remaining 1,175 inventoried roadless areas representing 43.6 million acres were identified as non-selected roadless areas.

That FES identified the four factors which were utilized in the final list of New Wilderness Study Areas. They were: public input, Quality Index, Effectiveness/Cost Index, and more specific knowledge of the areas and situations by the individual Regional Foresters.

Public input represents the input received from the public as a result of various public involvement actions accomplished prior to August, 1972. The input on each inventoried roadless area was classified into one of four categories: 1) general uniform agreement for a New Wilderness Study classification; 2) general uniform agreement against a New Wilderness Study classification; 3) divided public opinion; or 4) no information or few opinions expressed by the public.

The Quality Index estimated the relative value of the average acre on each inventoried roadless area based on 14 variables grouped into 3 factors: 1) scenic quality; 2) isolation and likely dispersion of visitors within an area to minimize contacts; and 3) variety of wilderness experiences and activities available in the area.

The Effectiveness/Cost Index was calculated in four steps. First the Quality Index was multiplied by the gross acreage in a given inventoried roadless area. Second, this product was divided by the constant 100 to reduce the magnitude of the number (this did not affect the relative rankings of areas). Third, a Total Opportunity Cost for the area was tabulated using the sum of timber values, potential water development values, mineral values, replacement of special use improvements, extra private land acquisition costs, and various budget costs. This total was divided into the Effectiveness Index to result in the Effectiveness/Cost Index.

Page 444 of the Forest Service's 1973 Final Environmental Statement on Roadless and Undeveloped Areas provides the following statistical information on Roadless Area No. B11-Grassy Knob:

Size	12,000 acres
Quality Index	57
Effectiveness/Cost Index	16.6423
Public Involvement	General uniform agreement against a New Wilderness Study Area Classification

For both the Quality Index and the Effectiveness/Cost Index, the higher the number, the higher the ranking for wilderness. The maximum possible for the Quality Index was 200.

Roadless Area B11 was below the Quality Index average of 75 for the 12 initial inventoried roadless areas on the Siskiyou. In fact, it ranked second lowest. Nationally, it ranked in the lowest 20% for the Quality Index.

The roadless area had one of the highest Effectiveness/Cost Indices of the Siskiyou inventoried roadless areas. However, nationally, it only ranked within the lowest 20% for that index.

This land use study determined that additional acreage along the perimeter of and to the southeast of inventoried roadless area B11 also qualified as a roadless area. Subsequently, the 4,500 acre inventoried roadless area B13-Redcedar-Sunshine was annexed to B11. Although this addition made little change in the characteristics of B11 except total acreage (e.g., the Quality Index for the combined area remains the same as that for B11-57), the land use alternatives considered for the Planning Unit fully reflect this revision.

P. Wildlife

The Unit contains a large variety of wildlife characteristic of this area, including both game and non-game species. The latter category contains two species considered threatened by the State of Oregon.^{1/} However, while the total number of species is large, the population levels are generally low.

The almost total absence of early stages in the succession of plant communities is the primary reason for the low population levels of many species. This is particularly true for most game species such as deer and elk. However, some other species, particularly threatened species like the northern spotted owl, thrive in the existing environment.

Big game animals include black-tailed deer and black bear. A few cougar may roam the Unit. Roosevelt elk are known to inhabit adjacent areas but probably do not often get into the Unit. It seems likely that population levels of these species, while never high relative to many areas in Southwestern Oregon, were considerably higher throughout much of history. The reoccurring nature of wildfire prior to the advent of effective fire control organizations, resulted in periodic conversions of later-stage successional communities into earlier-stage successional communities. The later provided more and better food for deer and other species than the former.

Carrying capacity and population levels would increase for several years after such a disturbance, reach a plateau, and then gradually decrease as succession progressed. The periodic nature of wildfire kept recycling this sequence of events on areas throughout the Unit. The overall effect was a higher carrying capacity and higher population levels in former times relative to the last 30-40 years.

^{1/} Threatened species refers to any species which is likely to become an endangered species within the foreseeable future throughout all or a significant portion of its range.

Several species of small game animals and upland game birds are permanent or part-time residents of a variety of habitats in the Unit. Small game animals include silver-gray squirrels, pine squirrels, and brush rabbits. The tree squirrels prefer wooded habitats of either coniferous timber or hardwoods, while brush rabbits prefer areas of dense cover in earlier stages of succession. Timber harvest, clearcutting for example, might result in temporary local declines in squirrel populations and increases in rabbit populations. Resident upland game birds include mountain quail, valley quail, and blue and ruffed grouse. The band-tailed pigeon, a migratory species, frequents the Unit in late summer and fall. Each species of game birds would probably benefit from habitat alterations associated with timber management in the Unit. Vegetative communities in early stages of succession (grass and chaparral) surrounded by climax communities provide excellent habitat variety, edge effect, and feeding areas for quail, grouse, and pigeons.

Furbearers in the Unit can be segregated into two groups based on habitat preferences, riparian species, including beaver, otter, raccoon, and mink, which are generally found in association with aquatic habitat, and species inhabiting the uplands, including coyote, bobcat, gray fox, striped and spotted skunks, ring-tailed cat, and weasel. It is doubtful that timber management would have much impact on species preferring riparian habitat, since riparian vegetation will be strictly protected. The upland species are generally carnivorous and would probably benefit from management activities which enhance numbers of small game and non-game prey animals.

Non-game species likely to be found in the Unit include flying squirrels, spotted owls, bald eagles, and golden eagles. The northern spotted owl and the northern bald eagle are included on the State list of threatened species. One flying squirrel and three spotted owls were actually observed in the Unit while recent sightings have been made of the other two species in nearby areas of the Forest. An intensive wildlife inventory undoubtedly would locate greater existing population levels of these species and may locate other less-than-common species as well.

Road-building and timber harvest activities will alter the habitat for nearly all species. Most of them, including most game species, will benefit from the modified environment. Plant species common to earlier stages of succession will inhabit openings in the existing cover. Carrying capacity for, and population levels of most wildlife species will increase.

In contrast, a number of non-game species will suffer a negative impact from the implementation of such planned activities. This is particularly true of the threatened species and other species requiring solitude or the existing type of environment. If the Unit is currently supporting is carrying capacity of any of these species, the degree of negative impact from environmental modifications will be somewhat proportional to the percentage of suitable habitat modified. For example, some experts have suggested that a northern spotted owl pair requires 300-600 acres of generally undisturbed old-growth timber. Moderately-well to well stocked old growth stands containing an understory and relatively near small streams seem to be prime habitat. They've also found that the owl is extremely sedentary-natured, a characteristic

which retards the movement of birds to new and more favorable habitat when old sites are destroyed. In general, this means that in areas currently supporting their carrying capacity of spotted owls, population levels over time would tend to decline in direct proportion with the percentage of suitable habitat intensively developed. Although only three spotted owls have actually been observed in this Unit, it is unknown to what extent spotted owl population levels approach the full carrying capacity in the Unit.

The situation for the bald eagle is less difficult. For example, eagle pairs can be protected by preserving the nesting tree and an untouched buffer of at least 500 feet on all sides. In addition, 3-4 snags per acre can be left in harvested areas to provide perch sites, food sources, and potential nesting sites.

In accordance with Forest and Regional policies, known specimens of all rare, threatened, or endangered species will be protected.

Q. Planning Assumptions

Development of land use proposals for the Planning Unit were based on the following assumptions:

1. The area can support several uses.
2. There will be an increasing need to maintain a high quality environment.
3. There will be an increasing demand for all types of outdoor recreation.
4. The national demand for wood products will increase.
5. Elk River and Dry Creek will continue to provide important habitat for anadromous fish.
6. Population levels of most unique, threatened, and endangered floral and faunal species will continue to decline to the point of extinction as development progresses unless positive steps are taken to protect these species and their habitats.
7. The risk of wildfire ignition will increase with improved access.
8. The scenic resource will continue to increase in importance and significance in Forest Service resource management.
9. Forest and regional trends indicate the desirability of maintaining, upgrading, or creating trails with a significant recreation potential.
10. The economy of the surrounding communities will continue to be heavily dependent upon the wood industry and on the National Forest for raw material.
11. The national needs for mineral resources will increase.

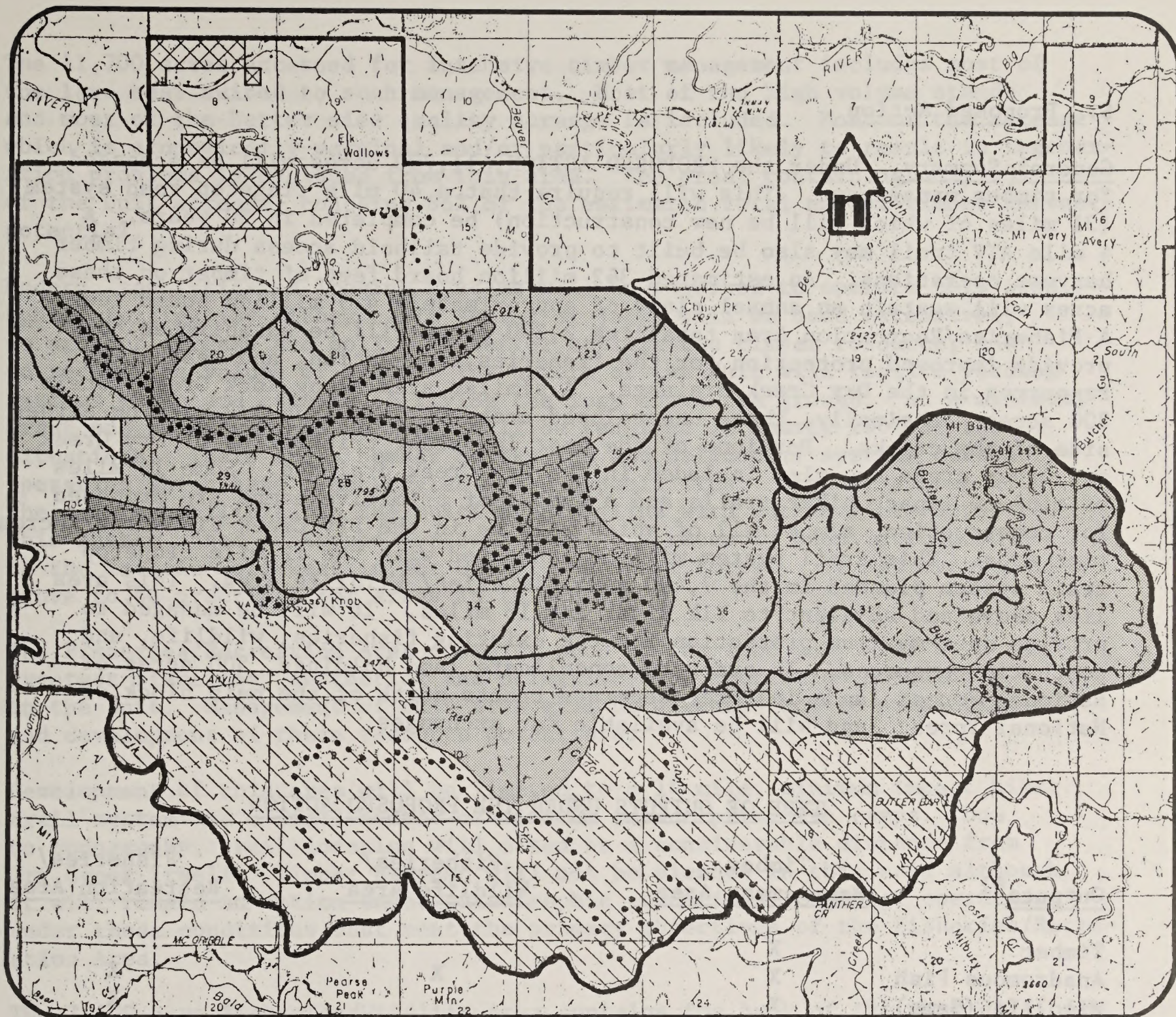
12. The planning period extends into the distant future (i.e., 100 years). However, the rapid technologic and socio-economic changes characteristic of recent decades cause long-range plans (such as this plan) to become increasingly obsolete with age. At a minimum, plans of this nature must be thoroughly re-evaluated within 5-10 years.

R. Management Objectives and Constraints

The overall management objective for this Planning Unit is "to maximize the net benefits over time which society derives from the forest resources within (and related to) the Planning Unit (benefits being measured in terms of both quantity and quality)." The weight given to each of the component variables in this function will reflect the values of the general public as expressed in legislative mandates, administrative directives, direct expressions, and other methods.

There are numerous constraints (or subobjectives) to work within. For example, management must be compatible with relevant laws, regulations, and budgets. Several of the more important laws are the Organic Administration Act of 1897, the Multiple Use-Sustained Yield Act of 1960, and the National Environmental Policy Act of 1969. Future conditions on the Unit must be monitored for comparison with the present status quo conditions to assure compliance with the following more specific constraints:

1. Management activities must protect and, where practical, improve water quality for fisheries and other uses.
2. Management activities must protect and maintain the existing soil resources.
3. Timber management and harvest activities must be designed to maintain or improve timber site productivity.
4. Intensive timber management activities must be designed to assure rapid regeneration and high utilization of the site.
5. Management activities must protect and improve the recreation potential of the area.
6. Management activities must protect the aesthetic qualities of the area as a whole from serious, and particularly substantial long-term, degradation.
7. Management activities must protect and will, wherever possible, enhance wildlife habitat.
8. Management activities must keep fire hazard at an acceptable level, commensurate with the risk.
9. The mix of management activities must efficiently use existing budget levels to produce a greater level of total public benefits.



proposed action

S. Proposed Action

General Summary. Under the PROPOSED ACTION, 11,700 acres will be accessed for timber management. This will require that a 40 mile ridgetop road system (31 miles of which will be new construction) be completed in 30 years. A 4 mile ATV trail may also be built to provide tailhold access during timber harvest operations. An estimated 362 million board feet of timber on these acres will sustain an annual yield of approximately 4.9 million board feet. A Fisheries/Recreation Area totalling 2,300 acres will be established to provide improved protection for the fisheries, recreation, and aesthetic resources in the Dry Creek drainage. A similar area along Rock Creek totals 200 acres. Basically, these undeveloped areas will include 1/8 mile on either side of the creeks. Portions of the most important tributaries of Dry Creek and other areas are also included in the Dry Creek drainage. Some 14 miles of minimum impact hiker trails and a number of primitive camps are proposed for construction, almost all of which will be in the Dry Creek Fisheries/Recreation Area. This trail system will be connected with the 12 mile ridgetop trail system planned in the 7,400 acre Fisheries/ Wildlife Area. This area lies above and adjacent to Elk River for 13 miles. It will be managed to provide near-maximum protection for the existing fisheries, wildlife, and aesthetic resources. In order to consolidate land holdings, 500 acres of National Forest lands in three separate tracts north of the main block of National Forest land will be available for exchanges.

TYPE OF OUTPUTS UNDER THE PROPOSED ACTION

<u>Outputs</u> *1	<u>Timber Management Area</u>	<u>Fisheries/ Wildlife Area</u>	<u>Fisheries/ Recreation Area</u>
Timber	X		
Anadromous Fish	X	X	X
Wildlife (Game)	X		X
Wildlife (Threatened or Endangered)		X	X
Water	X	X	X
Soil Movement (Accelerated)	X		
Dispersed Recreation (Road-Related)	X		
Dispersed Recreation (Non-Road-Related)		X	X
Wildland Qualities		X	X
Product Revenues	X		
Roads	X		
Trails		X	X

*1 Significant amounts.

The 11,700 acres accessed for intensive timber management includes most of the land best suited to such management. Most of the high volume stands and most of the better site quality acreage is included. Most of the acreage which is economically marginal and/or particularly likely to result in regeneration problems is excluded from this area. The area, containing only 53% of the Unit acreage, contains 66% of the estimated total annual timber harvest potential.

Modern, sophisticated logging systems will be required to operate this area. Uphill felling (by either cable assist or jack) will be used extensively to protect streams and soils, to better utilize the timber resource, and to reduce the volume of slash. The nature of the Unit will require yarding systems which are capable of flying the logs above the ground. At a minimum, front end suspension of the logs will be required in nearly 100% of the situations. There are a number of skyline and helicopter systems currently operating which have demonstrated these capabilities. Another system with the same capabilities is the multi-span skyline with intermediate supports. This system, used in Europe for some time, has recently been introduced to the Pacific Northwest in the Olympic National Forest. It may eventually prove to be practical for areas in this Unit.

The Fisheries/Recreation Area contains much of the land and water with the greatest fisheries, aesthetic, and primitive-type recreation potentials in the Unit. Management of this area will be directed toward protection and development of these resource potentials.

Development of this area will be limited to a 14 mile, minimum impact hiker trail system and a small number of minimum impact primitive camps. Due to topography, trail location will often be a considerable distance from Dry Creek itself. Timber harvest will not be planned in this area although it will remain an option under catastrophic conditions. Salvage operations under those conditions must meet the primary objectives of the Fisheries/Recreation Area.

The 7,400 acre Fisheries/Wildlife Area contains the bulk of the most difficult and harsh environments in the Planning Unit. Although the area represents 33% of the total Unit acreage, it contains less than 18% of the estimated total potential annual yield. However, the area does have high watershed, fishery, recreation, and wildlife values. It borders the Elk River for more than 13 miles and currently contributes good quality water to the river. It also contains a significant potential (presently unrealized because of no trail access) for primitive-type hiking. Panoramic views of the rugged slopes, the complex vegetation patterns, and the Pacific Ocean can be found at a number of points. The maze of vegetation types and sizes provide a wide variety of wildlife habitats.

Management in the 7,400 acre area will be oriented toward the protection and enhancement of the existing watershed, fisheries, recreation and wildlife values. The area will remain roadless and timber harvest will not be planned. However, aerial harvest will remain an option under catastrophic conditions. Salvage operations under those conditions must meet the primary objectives of the Fisheries/Wildlife Area.

A 12 mile minimum impact, ridgetop trail system will be planned for the 7,400 acre area. It will tie in with the trail system in the Dry Creek drainage and will provide a markedly different primitive-type recreation experience than that system. The ridgetop system will also be particularly beneficial for fire control purposes in this unroaded area.

Non-game, and particularly the threatened species, will be given priority consideration in the management of this area. Management practices will be designed to maintain or enhance carrying capacity and population levels of these species.

Timber harvest in the Timber Management Area during the first decade will be accomplished at a conservative rate. This will permit additional evaluation of on-the-ground results from the use of various road construction techniques, timber harvest methods, and logging systems prior to the commitment of large acreages. However, the high cost of road construction in this difficult Unit may prohibit this approach if main access roads are constructed during timber sale contracts. The problem is not that road construction is uneconomic--it is economically feasible. The problem is that in order to pay for the main access roads during the first entries, initial timber harvests probably would have to be spatially concentrated along the new roads to a degree greater than that which is desirable. Timber harvests during the rest of the rotation would use these same main access roads, leaving only the less expensive secondary roads to be constructed.

Although quality control during road construction under timber sale contracts in recent years has often equaled or exceeded that normally attained under public works projects, public funding for the main access roads in this Unit would be desirable (though not absolutely essential). The 13 miles proposed for construction with public funds probably would be completed in two or three phases. Total costs are estimated at nearly \$2.9 million. Ensuing timber harvests would return the investment to the U. S. Treasury.

Prior to initiating any ground disturbing project resulting from this plan, a reconnaissance or more intensive survey, if necessary, will be conducted to identify historical and archeological sites or areas.

II. ENVIRONMENTAL IMPACTS

The PROPOSED ACTION, like an specific management activity, will cause environmental impacts. Many of these impacts extend beyond the boundaries of the Planning Unit. They involve physical, biological, social, and economic variables. Some of the impacts will generally be considered desirable while other impacts will generally be considered undesirable. The goal of decision-makers and land managers is to generate the most net public benefits by minimizing the negative impacts while maximizing the favorable impacts.

As with most Planning Units containing a high percentage of inventoried roadless area, most of the Unit has been in the commercial timber base and has been contributing to the Forest's programmed annual harvest for years. At the same time, the volume actually cut off the acres in the Unit itself has been only a fraction of that contributed to the Forest's programmed annual harvest because no harvesting has actually been accomplished in the unroaded area. However, the point in time has been reached where one of three things must happen: 1) The roadless area could be left undeveloped and the commercial timber base reduced. This would reduce the Forest's programmed annual harvest but would preserve the existing environment; 2) The roadless area could be fully developed and the commercial timber base be retained. This would not alter the Forest's programmed harvest but would alter the existing environment; 3) The roadless area could be partially retained. This would retain part of the Unit's contribution to the Forest's programmed annual harvest and retain part of the existing environment. The PROPOSED ACTION follows the third path.

The primary environmental impacts will be generated by road construction and timber harvest activities in the Planning Unit. Both the potential and the actual environmental impacts will increase with the commencement of road construction, timber harvest, and intensive second growth management activities. Primarily negative impacts will accrue to air and water qualities, aesthetic quality, other amenity values, the existing flora and fauna, and the ecosystem in general. Also, some future land use alternatives are pre-empted. Slightly negative impacts will accrue to the socio-economic environment--particularly in the local area but to a lesser degree, to this environment on a regional and on a national basis. However, relative to the other alternatives considered, the impacts will be slight to moderate.

In order to realize the 4.9 million board feet annual yield an average of 106 acres (clearcut equivalent) will be harvested each year. Although, this average is subject to wide variations (70 - 410) depending on the timber type, economic and technical realities will tend to keep the acreage near the average. Also, for economic and technical reasons, it is unlikely that the harvest will be exactly 4.9 million board feet each year. In addition, first decade harvests will be conservative. However, the deficits and surpluses will balance.

Accelerated soil erosion and water quality degradation will be two of the most important impacts in this Planning Unit which is characterized by steep slopes, unstable and erosive soils, and high annual rainfall. However, techniques and equipment to minimize these impacts at acceptable levels are available and will be used. Monitoring activities will provide feedback to help assure that impacts will be kept at acceptable levels.

Studies cited by the President's Advisory Panel on Timber and the Environment indicate that an overwhelmingly large percentage of the accelerated soil erosion in timber harvest areas can be attributed to roads. Road failures, poorly-drained roads, and exposed cut and fill slopes are the primary source. The engineering techniques called for the PROPOSED ACTION will be required to avoid unnecessary accelerated soil loss.

Some normal timber harvest and intensive timber management practices could be large contributors to soil erosion in this Unit. The rock mulch surface layer found throughout the Unit is held together by a weave of fine roots. Substantial disturbance of this layer by the ground skidding of logs, by broadcast burning of slash, or by similar activities would cause instability in the surface layer and would expose erosive soil fines. A long-term raveling problem and a considerable amount of accelerated erosion would result. However, under the PROPOSED ACTION, erosion problems will be minimized at an acceptable level by virtually prohibiting the erosion-triggering activities mentioned above.

Nationally, concern has been expressed over the long-term loss of soil productivity through timber harvest. Although trees absorb appreciable amounts of essential nutrients, most are deposited in the foliage, twigs, fruits, and roots, none of which are removed during timber harvest. Nutrients lost are replenished by the processes of soil weathering, nitrogen fixation and atmospheric additions.

While removal of the timber will not result in any significant loss of long-term soil productivity, activities required for such removal have a significant potential if they result in substantial accelerated soil erosion. Since most of the available nitrogen and other essential nutrients are held by organic matter and soil fines within a foot of the surface, accelerated surface soil erosion could result in a rapid and substantial reduction of soil productivity. Here again, the virtual elimination of the erosion-triggering activities mentioned above will minimize this problem under the PROPOSED ACTION.

Water quality can be degraded by the introduction of soil sediments, organic material, chemicals, heat, etc. Accelerated soil erosion would result in increased sedimentation of the stream channels and increased water turbidity. Higher levels of soil nutrients and other chemicals may be introduced into the water solution--being carried by eroding soil particles. The introduction of organic matter in streambeds may cause a significant reduction in water oxygen content, and a significant increase in organic chemicals as the decay of these substances progresses. Removal of vegetation along stream channels may increase the thermal absorption of stream waters. The resulting elevated stream temperatures reduce the water's oxygen-holding capacity and accelerate the biologic processes in the water.

Timber management activities may also slightly affect the rate of runoff and the degree of fluctuation in streamflow as explained in the Water portion of the Description.

Each of these impacts may generate secondary impacts to fishery resources and other downstream users of the water. For example, accelerated erosion may compact or even cover spawning gravels, adversely affecting anadromous fisheries. The smaller eroded particles may remain suspended in solution, reducing water quality for recreation and downstream consumption. Nitrates and other chemicals may enter solution with the soil particles to which they were attached. The chemical balance of the water altered, water-based flora and fauna may or may not be altered. A reduction of streamside shade and a substantial introduction of organic material into the stream may reduce the water's oxygen capacity, adversely affecting fish and other flora and fauna. In general, the degree of negative effects will vary with the magnitude and frequency of the initial impacts.

Publications have been written on each of these impacts in an established ecosystem. In most cases, seemingly simple primary impacts may generate secondary impacts which generate tertiary impacts until the "simple problem" becomes a very complex network problem. It should be obvious that the easiest point to minimize such problems is at the primary impact stage. For example, eliminating any substantial amount of accelerated erosion and protecting streambanks would minimize the secondary and tertiary impacts above and beyond natural levels. Management under the PROPOSED ACTION is designed to do just that. Therefore, the potential impacts to the aquatic environment discussed in the last four paragraphs will be kept at acceptable, low levels, if impacts actually materialize.

Minimizing impacts to the fisheries resource is, to a large extent, linked to the protection provided the soil resource and the area around streams. Any significant amount of sediment, chemical, or thermal pollution beyond existing levels will adversely affect the fisheries resource. In general, the degree of negative impact will vary with the amount of pollution introduced and the frequency of introduction. Potentials for some positive impacts exist where active soil movements can be stabilized and where shading vegetation can be introduced along unshaded stream segments.

High sediment levels can compact or even cover critical spawning gravels, seriously reducing future population levels of valuable chinook salmon, steelhead, and other anadromous fish. Thermal pollution, particularly when combined with low streamflow levels, can cause serious problems. An increase in stream temperatures of only a few degrees may significantly increase mortality rates in the fisheries population. This is particularly true where existing temperature levels are at a threshold and where water is confined to ponds as in a fish hatchery operation. Such is the case along the Elk River, where water temperatures often are marginal for hatchery operation during summer months under existing conditions.

Although impacts of the magnitude outlined above will not occur under the PROPOSED ACTION, relatively minor adverse impacts to the fisheries resource can reasonably be expected. The Unit's carrying capacity for anadromous fish will be slightly reduced. However, close to 100% of the existing population levels of these species will be sustained.

The almost total absence of early stages in the succession of plant communities is the primary reason for the low population levels of most species, including most game species. In contrast, the vegetation types together with the lack of development are the primary reasons for the existence of populations of threatened species. In developing most of the Unit, the PROPOSED ACTION will gradually change the vegetative mix to a patchwork of varying types and ages over most of the Unit. However, the 45% of the Unit in the Fisheries/Recreation and Fisheries/Wildlife Areas will retain its basic old-growth character.

It has been estimated that the most productive portion of an 100 year rotation for useable browse is the first 20 years following harvest. Actually, the browse productivity curve begins to rise sharply 1-2 years after harvest, peaks 4-5 years later, and then gradually declines to the twentieth year where it maintains a level through the rest of the rotation. One can see that under sustained yield timber management, overall Unit browse productivity will continue to increase through the twentieth year when the new, higher level equilibrium point will be attained. Beyond that time, there will be roughly 1 acre dropping to the 20-100 year base productivity rate for every acre increasing above the same rate.

The overall impact on wildlife can be generalized as follows. Carrying capacity for species favored by earlier successional stages, including most game species such as deer and bear, will increasingly improve through the twentieth year. Population levels will likely lag behind carrying capacity levels until perhaps the twenty-fifth year when the new higher equilibrium level will be attained. Unit carrying capacity for species favored by the existing environment, including threatened species such as the northern spotted owl, will gradually decrease through the rotation. However, under normal patterns of sustained yield timber management, the entire road system should be in by the thirtieth year and few, if any, large solid blocks of undisturbed old-growth timber will remain beyond year 50. This is particularly important for solitary creatures like the spotted owl. It means that the spotted owl population level will probably reach its new, low equilibrium level some years beyond 50. Few, if any, individuals will exist outside of either the Fisheries/Wildlife or Fisheries/Recreation Areas. However, the impact on northern bald eagles will be minimal. Observed specimens will be fully protected and most of the prime habitat will be protected by management of the Fisheries/Wildlife Area.

Air quality will not be substantially altered by the PROPOSED ACTION. Slash burning will be limited almost exclusively to YUM piles on landings. Combustion in such piles is usually more complete than that attained by broadcast burning. This combined with the fact that less volume is burned, results in less emission of pollutants--particularly particulate matter. Another minor source of pollutants will be activities associated with development such as road construction and timber harvest. This will include both exhausts from internal combustion engines and dust from operations. Both types of pollution will be minor, localized, and periodic in occurrence.

The use of herbicides will be periodically required in some areas under intensive timber management under the PROPOSED ACTION. The need for their application will be carefully evaluated on an area by area basis. An Environmental Impact Statement covering the impacts on all areas selected for treatment in southwestern Oregon National Forests is filed with the Council on Environmental Quality (CEQ) annually.

The PROPOSED ACTION will result in increased levels of sound being produced in the Planning Unit. Primary sources will be road construction activities, timber harvest activities, and vehicular traffic. The increased sound levels will result in a deterioration of the primitive nature of the Unit. These sounds will somewhat diminish the primitive experience of those using the Fisheries/Recreation and Fisheries/Wildlife Areas from the existing potentials. However, the sound-producing activities will be periodic in occurrence, keeping sound levels at their present base much of the year.

Development of existing undeveloped areas results in loss of future land use options. For example, the possibility of future allocations to potential uses of the area which require essentially pristine natural environments (e.g., . Wilderness or some kinds of research) is foreclosed.

Relatively minor environmental impacts of the sort already discussed may also be generated by activities not associated with timber harvest. These activities fall into three categories--those caused by any property disposal, those associated with trails and primitive camps, and those associated with essentially permitting nature to take its course in certain areas.

The PROPOSED ACTION will make 500 acres of National Forest land available for exchange. These acres lie in three tracts separated from and north of the main block of National Forest. Disposal will result in more efficient and effective management on both National Forest and private lands in this Unit and elsewhere on the Siskiyou National Forest. However, based on the observation of the usual timber harvest procedures on private lands within the Unit, the potential for environmental damages will increase if these acres are acquired by private owners. The primary negative impacts are likely to be accelerated soil erosion and decreased water quality. The degree of impacts will be constrained by the Oregon Forest Practices Act regulations. Further, these lands drain directly into the Sixes River so Dry Creek will not be impacted.

Some 26 miles of hiker trails and a small number of primitive camps are planned in the PROPOSED ACTION. These developments will be planned for minimum impact construction. Camp sites will be properly located and sanitary facilities put in should use become heavier than anticipated. There shouldn't be any significant impacts from construction. However, some potential exists for slight water quality degradation, accelerated soil erosion, aesthetic degradation, and degradation of the habitat for the two threatened species. The probability of these impacts occurring to any significant degree is low under reasonable and anticipated use levels.

Management designed to essentially permit natural processes to proceed creates impacts also, although this is normally considered to be the basic dynamic model. Under the PROPOSED ACTION, management of the Fisheries/Wildlife and Fisheries/Recreation Areas will tend toward that model with some important exceptions. For example, wildfire, which has periodically occurred throughout history in the Unit, will continue to be controlled throughout the entire Unit. Timber harvest will not be planned in the two aforementioned areas but will remain an option under catastrophic conditions where aerial harvest is compatible with the primary objectives in each area.

There are several long-term impacts from such management. For example, the full range of land use options is preserved for the future when social values and needs may differ from those of today. Ecologically, plant succession will progress toward climax with more shade tolerant species gradually replacing less tolerant species. Fuel loading will continue until a new and higher equilibrium level is reached relative to the fuel load in areas under intensive timber management. However, wildfire could reduce the fuel load before it reaches that point.

Thus far, the discussion on the environmental impacts has been focused on biological and physical aspects of the ecosystem in and related to the Unit. However, the impacts of the PROPOSED ACTION extend beyond the Unit boundaries. The social and economic environments of the local area are strongly impacted while the impact on these environments at the regional and national levels is small to insignificant.

The 4.9 million board feet annual yield estimated for the PROPOSED ACTION represents an estimate of the non-declining annual harvest which could be sustained based on current technology, economics, and timber management practices. As such, it differs from (and is larger than) the Unit's apparent current contribution to the Forest's programmed annual harvest which was calculated for the Forest during the early 1960's (a new timber management plan is in preparation). Updating the current contribution to the Forest's programmed annual harvest to make it comparable with the annual yield estimates for the Unit indicates that the relative current contribution of the Unit would be approximately 5.5 million board feet per year (referred to as potential in the second table below). Therefore, the PROPOSED ACTION will result in a relative loss of 0.6 million board feet per year even though an absolute gain is indicated over the existing situation.

ESTIMATED ECONOMIC ACTIVITY SUPPORTED by the PROPOSED ACTION

	<u>Local</u>	<u>Non-Local</u>	<u>Total</u>
Timber-Related Jobs	55	27	82
Fisheries & Recreation Related Jobs	<u>18</u>	<u>18</u>	<u>36</u>
Total Jobs	73	45	118
Annual Economic Impact (thousand dollars)	840	530	1,370

ESTIMATED ECONOMIC ACTIVITY CURRENTLY SUPPORTED BY THE PLANNING UNIT

	<u>Total Existing</u>	<u>Total Potential</u>
Timber-Related Jobs	54	89
Fisheries & Recreation Related Jobs	<u>35</u>	<u>35</u>
Total Jobs	89	124
Annual Economic Impact (thousand dollars)	1,050	1,460

The 4.9 million board feet annual yield will sustain an estimated 26 jobs in the local economy. These jobs include those required for the harvesting and processing of the raw material in the local area. Processing outside the local area will create further employment-an estimated 12 jobs.

Almost all of these jobs must be considered "basic employment." It has been estimated that each of these jobs will generate demands for as many as two "non-basic" or support jobs in the forms of doctors, grocery store clerks, automobile mechanics, government employees, etc..

However, this ratio of non-basic to basic jobs varies considerably and is often much lower in small rural economies. For this local area, a reasonable estimate is that the annual yield in the PROPOSED ACTION will directly or indirectly support 55 local jobs and a total of 82 jobs in all of western Oregon, including the local area. This represents an increase of 28 jobs over existing levels and accounts for 92% of the potential jobs under the present land allocations.

The net value of the fisheries resource attributable to the Planning Unit has been estimated at \$441,000 per year. The PROPOSED ACTION will retain nearly 100% of this value. One can only speculate on the number of jobs this resource generates. However, a reasonable estimate seems to be that the total number of jobs directly or indirectly supported primarily by the fisheries resource is 36, half of which are local.

An estimate of the total number of jobs directly or indirectly generated by the PROPOSED ACTION in this Planning Unit is 118, 73 of which are local. The Unit is estimated to be sustaining a total of 89 jobs at present and have a potential under the same land allocations of 124. It should be borne in mind that all these estimates are subject to considerable variation as very reliable figures for a given small area are difficult to calculate. None-the-less, these estimates are useful for relative comparisons between the PROPOSED ACTION and its alternatives.

Similarly, total annual economic impact estimates have been made for comparison purposes. The total value to the economy of wages, salaries, profits, government land management expenditures, and County revenues (from the 25% formula) directly or indirectly attributable to the Unit is estimated at nearly \$1.4 million each year. At present the Unit appears to be contributing less than \$1.1 million and to have a potential under the same land allocations of nearly \$1.5 million.

These employment and other economic impacts are considerable in this lightly-populated local area. Port Orford, located on the coast some four air-miles west of the Planning Unit, has a population of 1,000. Total population in the northern third of Curry County, including Port Orford, probably does not exceed 2,600. Using the average percentage of the total Curry County population which was employed in 1971 (38.5%), this indicates that there is an average of roughly 1,000 jobs in this local area. Outputs from the PROPOSED ACTION would therefore account for at least 8%-9% of these. However, the total economic impact probably represents a larger percentage of the total economic activity.

Sustaining 118 jobs, 73 of which are local jobs, will be the major socio-economic benefit of the PROPOSED ACTION. This is particularly important in a county where 30% of the families earn less than \$6,000 per year (1970 data) and where unemployment rates traditionally run ahead of the State average.

In summary, the PROPOSED ACTION appears to balance environmental and socio-economic concerns without creating serious impacts to either. Maintenance of this situation will require adherence to quality control standards and monitoring of results. These standards include: the Soil Management Direction; the Streamside Management Unit Policy; the Water Quality Standards; the Visual Management System; and the Unit Plan as shown and described in this document. The first four of these can be found in Appendices A,B,C,D.

III. SUMMARY OF PROBABLE ADVERSE ENVIRONMENTAL EFFECTS WHICH CANNOT BE AVOIDED

Adverse environmental impacts which cannot be avoided under the PROPOSED ACTION include: water, air, visual, and noise pollution; accelerated soil erosion; degradation of fishery habitat; reduction of habitat for threatened species; and elimination of wilderness characteristics. Each of these impacts will adversely affect the status quo to some degree. However, with the exception of the last two impacts, all of these impacts will be small to insignificant.

Although Soil Management Policy, timber harvesting techniques, and road construction techniques will minimize accelerated soil erosion at an acceptable level, some increase over existing levels is expected where roads are constructed and where timber is harvested. These increases will be physically impossible to avoid, periodic in occurrence, and relatively small in magnitude under the PROPOSED ACTION.

Water quality may decrease slightly, while runoff rates accelerate slightly and streamflow fluctuations increase slightly in developed areas. However, the last two impacts will be virtually unmeasurable. These same impacts will have slight adverse effects on the fishery habitat. However, these changes will be kept within levels specified in the Water Quality Standards (Appendix C). Soils Management Policy and Streamside Management Unit Policy will be strictly adhered to. Timber sale and road construction contracts will also be modified to provide for shutdown of operations causing impacts in excess of quality control standards. On-the-ground inspection and continuous water monitoring will provide the checks on performance to help ensure that impacts will be at a low and acceptable level.

Air pollution will be minor in nature and periodic in occurrence. Relatively small amounts of air pollution will be created by development activities and by the burning of slash piles. Such burning will be subject to the Slash Smoke Management System. This system coordinates slash burning in the State to facilitate rapid dispersal of smoke and to minimize resulting air pollution.

Noise from road building and timber harvesting activities will be heard periodically throughout most of the Planning Unit. This will reduce the feeling of seclusion for any person seeking a primitive-type recreation experience in the Unit at that time. However, the level of this unavoidable noise will be relatively low except in proximity to the source.

Visual qualities will be degraded to varying degrees, depending on location and time. However, the seen area from the most heavily-used portions of the Unit will not be substantially altered by the PROPOSED ACTION. This includes the area seen from Road No. 325 along Elk River and the area seen from Dry Creek. The seen area from roads in the regular timber management area will be altered over time as roads are constructed and timber is harvested and regrown. Judgement as to the degree of visual and aesthetic degradation in these areas will vary widely, depending on the observer and the time of his observation.

Relative to the status quo, it is estimated that the PROPOSED ACTION will not create any substantial adverse impacts to the local economy in terms of raw material supply and employment. In fact, the Unit's total economic activity is estimated to eventually increase about 30% over existing levels. However, relative to existing potential, the Unit's contribution under the PROPOSED ACTION will decrease about 5%.

One of the two most significant adverse environmental impacts under the PROPOSED ACTION is the reduction of suitable habitat for the threatened northern spotted owl. If the Unit currently contains its carrying capacity of this species, population levels in the Unit will decline somewhat proportionately with the decline in suitable habitat. In western Oregon, population levels of this bird are thought to be relatively high but declining rapidly as old growth stands are harvested (this extremely sedentary bird requires old growth timber stands). Although known specimens will be protected and most of the prime habitat preserved, the PROPOSED ACTION will steadily reduce the carrying capacity of the Unit for the spotted owl to a level as low as 45% of that at present over a period of 50-60 years. Although the long-term decline of spotted owl population levels in the Unit is unavoidable under the PROPOSED ACTION, it is significant that at least 45% of the present carrying capacity will be sustained. Were this the case throughout western Oregon, the species would not be threatened.

The PROPOSED ACTION will result in minimal impacts to any population of the northern bald eagle. Some 45% of the Unit (containing virtually all of the prime habitat for eagles in this Unit) will be outside of intensive timber management areas and will remain largely unaltered, to the benefit of existing populations. In addition, any eagle nest found in the timber management area will be given full protection. This will include preservation of the nesting tree and a buffer of at least 500 feet on all sides of that tree. In addition, 3-4 snags per acre can be left in harvested areas to provide perch sites, food sources, and potential nesting sites.

Any as yet unrecognized plant or animal species in the Unit which is classified threatened or endangered will be appropriately protected when discovered. Meanwhile, management of the Fisheries/Wildlife and Fisheries/Recreation Areas will provide sanctuaries for such species.

The second significant adverse environmental impact under the PROPOSED ACTION is the elimination of wilderness in the Planning Unit. Development will eliminate or diminish some wilderness qualities. Within a relatively short period of time this will preclude any future consideration of statutory Wilderness designation where the roadless area in this Unit currently meets the criteria established in the Act establishing the National Wilderness Preservation System. This impact is mitigated somewhat in that both the Fisheries/Wildlife and Fisheries/Recreation Areas will remain basically primitive in character.

While the PROPOSED ACTION will maintain the option for a possible future designation of a Research Natural Area in the Anvil Creek drainage, that option will be virtually pre-empted in the lower-priority Dry Creek drainage. However, it should be noted that the proposed Store Gulch (Hoover Gulch) Research Natural Area represents the same type. Current recommendations call for one RNA per type. In addition, under the conservative rate of development called for in the PROPOSED ACTION, options in the Dry Creek drainage are maintained for some time after the commencement of development activities.

IV. RELATIONSHIP BETWEEN LOCAL SHORT-TERM USES OF MAN'S ENVIRONMENT AND THE MAINTENANCE AND ENHANCEMENT OF LONG-TERM PRODUCTIVITY.

The purpose of the PROPOSED ACTION is to provide a comprehensive land use and transportation system plan for this largely undeveloped Unit of 22,100 acres. Of the entire range of alternatives considered, the PROPOSED ACTION appears most likely to maximize total net public benefits. This is accomplished by achieving a balance between the various uses and between the various concerns and by matching land use with land suitability.

The PROPOSED ACTION will alter the mix of amenity values in the Unit over the long term. A visitor's feeling of isolation and solitude will be reduced to some degree throughout the Unit but primarily in those areas of greatest development. The most often viewed seen areas, that from Road No. 325 along the Elk River and that from lower Dry Creek, will not be significantly altered under the PROPOSED ACTION. However, development of the ridgetop road system will make other areas more accessible. The nature of these areas will continue to change as timber harvest and regrowth progresses through the rotation. Basically, the change will be toward a more open and diversified vegetation pattern than which presently exists. The perceived value of this change will vary widely, depending on the observer and his time of observation. However, considering the entire Unit, serious long-term degradation of aesthetic qualities (e.g. destruction of the scenic qualities along either Dry Creek or the Elk River) will not occur under the PROPOSED ACTION.

Most wildlife species, and particularly most game species such as deer, will benefit from the PROPOSED ACTION. Higher population levels of these species than those levels currently existing will be sustained. Some wildlife species, and particularly the northern spotted owl, will be adversely affected. The PROPOSED ACTION will not eliminate all suitable habitat for these species but Unit carrying capacity for some will be substantially reduced. Population levels will reflect these changes and lower levels will be sustained.

The PROPOSED ACTION will not adversely affect the long-term productivity of the fisheries resource to any substantial degree. Water quality will similarly and concurrently be maintained. Various quality control regulations and continuous water monitoring will assure this.

Closely related to the protection of the fisheries resource and water quality is the protection of the existing soil resource. Accelerated soil erosion will be minimized at an acceptable level by road construction, timber harvest, and timber management techniques. Soil Management Direction will be an overriding regulation. However, some additional soil erosion above levels currently existing is inevitable in any development scheme--especially during the first few years following initial activities. Quality control regulations and techniques will prevent any significant loss of long-term soil productivity.

Both road-type and primitive-type recreation potentials will be developed by the PROPOSED ACTION, resulting in an increased productivity for these uses over time. However, some wilderness qualities will be either lost or diminished, pre-empting some primitive recreation opportunities as well as some possible research opportunities.

The PROPOSED ACTION will provide a sustained, non-declining yield of timber. There will be numerous opportunities to increase production of timber on the better site quality land in the Unit. The outlook is for generally increased productivity over existing levels.

The PROPOSED ACTION will not affect the long-term productivity for either mineral production or grazing. Both existing levels and apparent potential is very low for both uses.

The Unit's contribution to the local and regional economies in terms of raw materials, economic activity, and dependent employment will remain basically unchanged over the short-term. However, over a longer-term, factors to reduce this contribution and factors to increase this contribution will inter-play. For example, improving timber processing productivity will tend to decrease timber processing employment. But exploitation of attractive opportunities to increase the raw material base through improvement in utilization and/or intensification of timber management will tend to increase timber processing employment.

V. IRREVERSIBLE AND IRRETRIEVABLE COMMITMENT OF RESOURCES

Irreversibility and irretrievability must be referenced to two periods of time. Given an infinite time period, virtually all "non-renewable" as well as "renewable" resources are renewable.^{1/} The exception to this occurs if a gene pool for some floral or faunal species is lost as in the case of the passenger pigeon around the turn of this century. The second reference period is much shorter-termed but is equally important. Within this socio-economic frame of reference, 20 years is a long time and the difference between 100 years in the future and 1000 years in the future from a given point in time is generally of minor importance. In this light, resources which are biologically renewable over 200 years for example, must be considered non-renewable within the socio-economic reference period.

Within the socio-economic frame of reference, implementation of the PROPOSED ACTION will commit most of the Planning Unit to development including road construction and timber harvesting. The rest of the Unit, specifically, the Fisheries/Wildlife and Fisheries/Recreation Areas, will be committed primarily to the protection of existing fisheries, wildlife, and aesthetic resources and development of the primitive recreation potential. Implementation of these land use designations will alter existing wilderness characteristics within several years. This will preclude the possibility of any future wilderness study or statutory Wilderness designation under the existing Public Law 88-577 (the Wilderness Act) since the wilderness resource is irretrievable in the socio-economic frame of reference. It will also preclude the possibility of research in undisturbed ecosystems over much of the Unit.

Based on existing information, implementation of the PROPOSED ACTION will result in an irreversible loss of habitat for the northern spotted owl within the socio-economic frame of reference. Suitable habitat will gradually decline to a level as low as 45% of that at present within 50-60 years. The impact on spotted owl population levels will be dependent upon the extent to which the existing population level approaches the Unit's carrying capacity.

In the longer frame of reference, the PROPOSED ACTION will not irreversibly or irretrievably impact the northern spotted owl. A gene pool for this species will be maintained within the Unit by protecting known pairs and by maintaining suitable habitat for any other pairs on nearly at least 45% of the Unit.

The PROPOSED ACTION will not irreversibly or irretrievably impact the northern bald eagle to any substantial degree in either frame of reference. Observed specimens will be fully protected and most of the prime habitat will be protected by management of the Fisheries/Wildlife Area.

^{1/} For example, coal is usually considered a non-renewable resource but within several hundred million years, it is likely that new deposits will have been created.

VI. ALTERNATIVES TO THE PROPOSED ACTION

Recognizing the fact that it would be impossible to evaluate each of a virtually infinite number of alternatives to the PROPOSED ACTION, the Forest Service examined five of the most reasonable alternatives. These spanned the range from minimum development to maximum development and also included a no-action plan. Each of these were evaluated on the basis of existing resources, land capabilities, socio-economic values, and environmental impacts. A matrix comparing the PROPOSED ACTION (Alt. 3) and its alternatives for some 50 variables follows discussion of Alternative 6.

The five alternatives examined will be discussed in the following order:

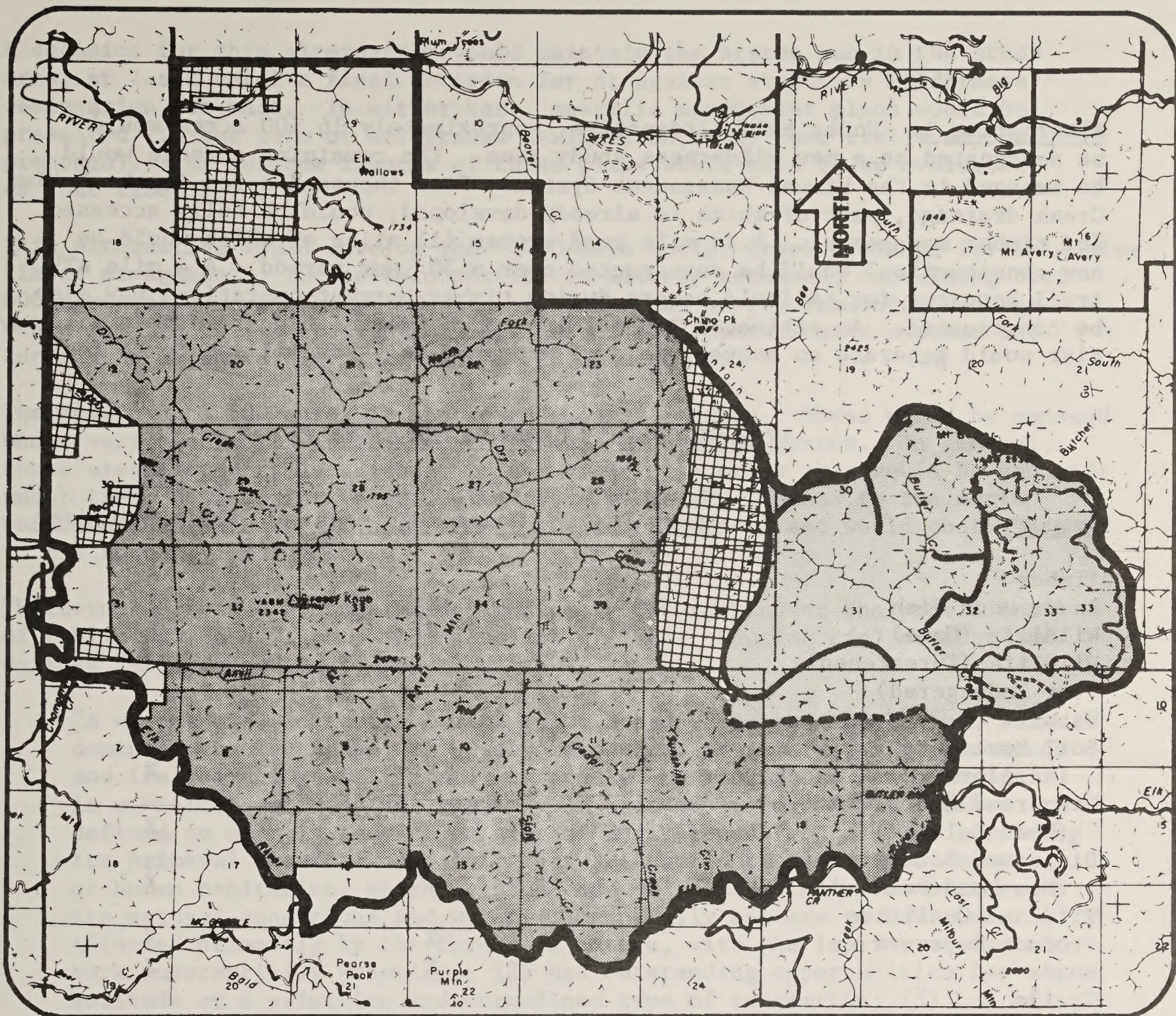
Alternative 1. All suitable roadless acreage in the Unit, or 16,500 acres, would be designated a new wilderness study area. Most of the remaining acreage would be developed for intensive timber management.

Alternative 2. Most of the Dry Creek drainage would be designated a Roadless Recreation Area. Most of the Butler, Rock, and Anvil Creek drainages would be developed for intensive timber management. The remaining 6,400 acres in the Elk River watershed would be designated a roadless Fisheries/Wildlife Area.

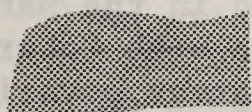
Alternative 4. Most of the Unit would be developed for intensive timber management. A 5,600 acre roadless Fisheries/Wildlife Area along and above the Elk River would be managed primarily to protect existing fisheries, wildlife, watershed, and aesthetic values.

Alternative 5. The entire Unit would be developed for intensive timber management.

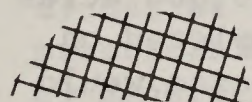
Alternative 6. No action would be taken to develop a comprehensive land use plan for the Planning Unit.



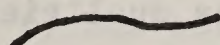
TIMBER MANAGEMENT AREA



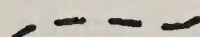
WILDERNESS STUDY AREA



VISUAL MANAGEMENT AREA



ROADS



A.T.V. TRAIL

alternative 1

Alternative 1: Under this alternative, approximately 16,500 acres would be designated as a new wilderness study area. The remaining acreage would be managed in the Visual Management System. Four thousand acres in the Butler Creek drainage, part of which is already developed, would be fully accessed for timber management. A 20 mile road system (11 miles of which would be new construction) would be constructed over a 30 year period. A 4 mile ATV trail required for tailhold access during timber harvest operations may also be constructed. An estimated 133 million board feet of timber in this alternative would generate an annual yield of approximately 2.0 million board feet.

TYPE OF OUTPUTS UNDER ALTERNATIVE #1

<u>Outputs</u> ^{*1}	<u>Wilderness Study Area</u>	<u>Timber Management Area</u>	<u>Visual Management Area</u>
Timber		X	X
Anadromous Fish	X	X	X
Wildlife (Game)		X	X
Wildlife (Threatened or Endangered)	X		
Water	X	X	X
Soil Movement (Accelerated)		X	X
Dispersed Recreation (Road-Related)		X	X
Dispersed Recreation (Non-Road-Related)	X		X
Wildland Qualities	X		
Product Revenues		X	X
Roads		X	X
Trails			

*1 Significant amounts.

This alternative would include the 12,000-acre inventoried roadless area B11-Grassy Knob and 4,500 acres of adjacent roadless area B13 in the list of new wilderness study areas. This study would examine the area in detail for its wilderness qualities. The subsequent report would recommend either for or against the study area, or portions of it, being included in the National Wilderness Preservation System. The final decision would remain with Congress. However, with the national list of new study areas showing 274 areas covering 12.3 million acres, and the rate of study projected at about 750,000 acres per year, it could be 10-20 years before the study would be completed on this area. During this time and until a decision is made, the area would be withdrawn from the land base for the programmed harvest calculation. Further activities which would affect the study area's wilderness qualities would be prohibited.

A decision for this alternative would maintain the status quo in the study area, at least until a final decision for or against statutory Wilderness designation was made. In either case, specific management plans would be presented (in the case of Wilderness designation, some foot trails may be proposed). The various impacts of these plans would have to be evaluated at that time.

This alternative would develop the 4,000-acre Butler Creek drainage for intensive timber management. The eastern portion is already accessed, containing over 600 acres of clearcut harvest units. Development of the remaining acreage would require the same stringent regulations and sophisticated systems and techniques as those discussed in the PROPOSED ACTION.

The remaining 1,600 acres is scattered amongst 7 areas. These would be managed under various classifications in the Visual Management System. In general, those areas immediately adjacent to the wilderness study area would be managed under the more restrictive classifications while the 3 areas to the north would be managed under less restrictive classifications and would contribute to the annual yield.

"Wilderness" refers to an area designated by Congress under the provisions of Public Law 88-577, the Wilderness Act of 1964. Section 2(c) of that law defines "Wilderness" as follows:

"A wilderness, in contrast with those areas where man and his own works dominate the landscape, is hereby recognized as an area where the earth and its community of life are untrammelled by man, where man himself is a visitor who does not remain. An area of wilderness is further defined to mean in the Act an area of undeveloped Federal land retaining its primeval character and influence, without permanent improvements or human habitation, which is protected and managed so as to preserve its natural conditions and which (1) generally appears to have been affected primarily by the forces of nature, with the imprint of man's work substantially unnoticed; (2) has outstanding opportunities for solitude or a primitive and unconfined type of recreation; (3) has at least five thousand acres of land or is of sufficient size as to make practicable its preservation and use in an unimpaired condition; and (4) may also contain ecological, geological, or other features of scientific, educational, scenic, or historical value."

The Act identifies seven characteristics of Wilderness:

- a) An area where the earth and its community of life are untrammelled by man
- b) An area of undeveloped Federal land retaining its primeval character and influence
- c) An area without permanent improvements or human habitation
- d) Has at least 5,000 acres of land or is of sufficient size to make practicable its preservation and use
- e) Generally appears to have been affected primarily by the forces of nature, with the imprint of man's work substantially unnoticeable
- f) Has outstanding opportunities for solitude or a primitive and unconfined type of recreation
- g) May also contain ecological, geological, or other features of scientific, educational, scenic, or historic value.

The 16,500 acres of undeveloped land includes all the land in the Unit meeting the most basic requirements for wilderness consideration. This area, while relatively small, is of sufficient size to preserve and use in an unimpaired condition. The Dry Creek portion seems better suited in this regard than the portion in the Elk River watershed in that the area includes almost all of the drainage.

The 16,500 acres are untrammelled by man but adjacent developed lands do confine the area. For example, the harvested section 36 and the road leading into the section definitely confine and influence the remainder of the Dry Creek drainage. Similarly, harvested privately-owned lands border the area on the north, west, and south sides.

The area itself basically retains its primeval character and with the exception of an old abandoned cabin along Dry Creek and the remnants of the lookout on Grassy Knob, is without improvements or human habitation. However, as discussed above, surrounding lands in and adjacent to the Unit strongly influence the total primeval characteristics of the area. These surrounding lands not only physically impact the area (e.g., section 36 in the headwaters of Dry Creek) but also influence the area in other important ways. For example, these lands are visually evident from many ridgetop viewpoints. As a result, two important qualities of wilderness, the visual appearance of naturalness, and the feeling of solitude and isolation, are substantially compromised.

The area within the boundaries of the 16,500 acres generally appears to have been affected primarily by the forces of nature. Man's imprint can be found however (e.g., the remnants of the old Grassy Knob lookout, old cedar stumps from the battery stock operation along Dry Creek in the 1930's, and portions of the ditch constructed for the Big Jewel mining operation at the mouth of Dry Creek which was active more than 70 years ago). Also, as pointed out above, due to the relatively small size of the area and the location of the area, surrounding developed lands exert a major influence on the area itself.

Finally, the area does not contain any unique or unusual features of substantial ecological, geological, scientific, educational, scenic, or historic value. Only by virtue of the fact that Dry Creek and several of the smaller drainages are mostly or entirely undeveloped at present, some value for natural ecosystems research is present. However, this characteristic is far from unique and, in addition, it should be noted that a well-established Research Natural Area system already exists in Oregon and Washington.

In conclusion, while the minimum characteristics of wilderness generally appear to be present (as seems probable for most of the inventoried roadless areas), the particular characteristics of the 16,500 acres and closely associated lands combine to degrade potential Wilderness quality. At the same time, opportunity costs which would result from foregoing development would be high in terms of economic activity and jobs.

The following discussion of environmental impacts is based on the period from the present time to whenever a final land use decision would be made if this alternative were selected.

ESTIMATED ECONOMIC ACTIVITY SUPPORTED BY ALTERNATIVE #1

	<u>Local</u>	<u>Non-Local</u>	<u>Total</u>
Timber-Related Jobs	22	11	33
Fisheries & Recreation Related Jobs	<u>18</u>	<u>18</u>	<u>36</u>
Total Jobs	40	29	69
Annual Economic Impact (thousand dollars)	450	330	780

This alternative would have a major impact on the socio-economic environment of the local area and a much smaller relative impact at the regional level. The Unit's present relative contribution to the Forest's programmed harvest would be slashed by approximately 64% to 2.0 million board feet. An estimated 22 jobs in the local area and 11 jobs elsewhere in western Oregon would be directly or indirectly supported by the annual yield. This represents an estimated loss of 21 existing jobs and accounts for only 37% of the potential jobs under the present land allocations.

Employment and other economic activity generated by the Unit's fisheries resource would remain virtually unchanged under this alternative. The contribution from the recreation resource probably would increase slightly but would remain at a relatively low level. Forest Service expenditures for land management activities would decrease sharply as would revenues to the county governments.

An overall estimate of the total number of jobs directly or indirectly generated by the Planning Unit under this alternative is 69, 40 of which are local. The total value to the economy of wages, salaries, profits, government expenditures, and County revenues (25% formula) directly or indirectly attributable to the Unit is estimated at nearly \$0.8 million each year. It should be kept in mind that these are "ballpark" estimates based on what little information is available. They are primarily useful in making relative comparisons amongst alternatives.

In order to realize the 2.0 million board feet annual yield, an average of 43 acres will be harvested each year. Depending on timber type, the acreage could vary from 30 to 165 in theory but technical and economic realities will keep the actual harvested acreage per year near the average. Also, the acreage harvested in any given year will vary for economic and technical reasons. With this relatively small annual yield, it is likely that 2-5 years' cut will accumulate before a timber sale is proposed.

The same quality control regulations and quality control monitoring would be used in this alternative as in the PROPOSED ACTION. Similarly, the same road construction, timber harvest, and intensive timber management techniques would be used.

The rate of accelerated soil erosion would be similar to that in the PROPOSED ACTION but the distribution would differ while the total volume decreases due to the fewer acres under development in this alternative. The primary change would be that little, if any, accelerated soil erosion would occur in the Dry Creek drainage.

Although the PROPOSED ACTION will not result in any substantial degradation of existing water quality, this alternative would result in an even smaller adverse impact due to less extensive development within the Unit. Water quality in Dry Creek should remain virtually unchanged in this alternative.

This alternative would not create any significant adverse impacts on the fisheries resource. It would retain status quo conditions in Dry Creek.

This alternative would have the least positive and negative impacts to wildlife species. Most species, including most game species, would benefit somewhat. Many non-game, and particularly threatened species, may receive a slight negative impact. Unit carrying capacity for the species receiving the most impact, the northern spotted owl, will gradually decrease to a level as low as 80% of that at present within 50-60 years.

Air quality would not be substantially altered by this alternative. Compared to other alternatives, the relatively small amount of development in this alternative would result in fewer and generally smaller timber harvest operations which may periodically cause localized air pollution.

Herbicide use would be periodically required in intensive timber management areas in this alternative, as in all other alternatives. The evaluation process for determining treatment areas and environmental impacts would include an Environmental Impact Statement as described in the Environmental Impacts section for the PROPOSED ACTION.

Noise pollution during implementation of this alternative would be periodic and confined primarily to the Butler Creek drainage. However, increased sound levels may occasionally be heard in the wilderness study area.

Management designed to essentially permit natural processes to proceed would create impacts also. So would the decision to control all wildfires in this area. For example, both would allow plant succession to proceed with more shade tolerant species gradually replacing less shade tolerant species. Fuel loading would continue until a new and higher equilibrium level is reached. This would increase the risk of a larger, more damaging wildfire should ignition occur.

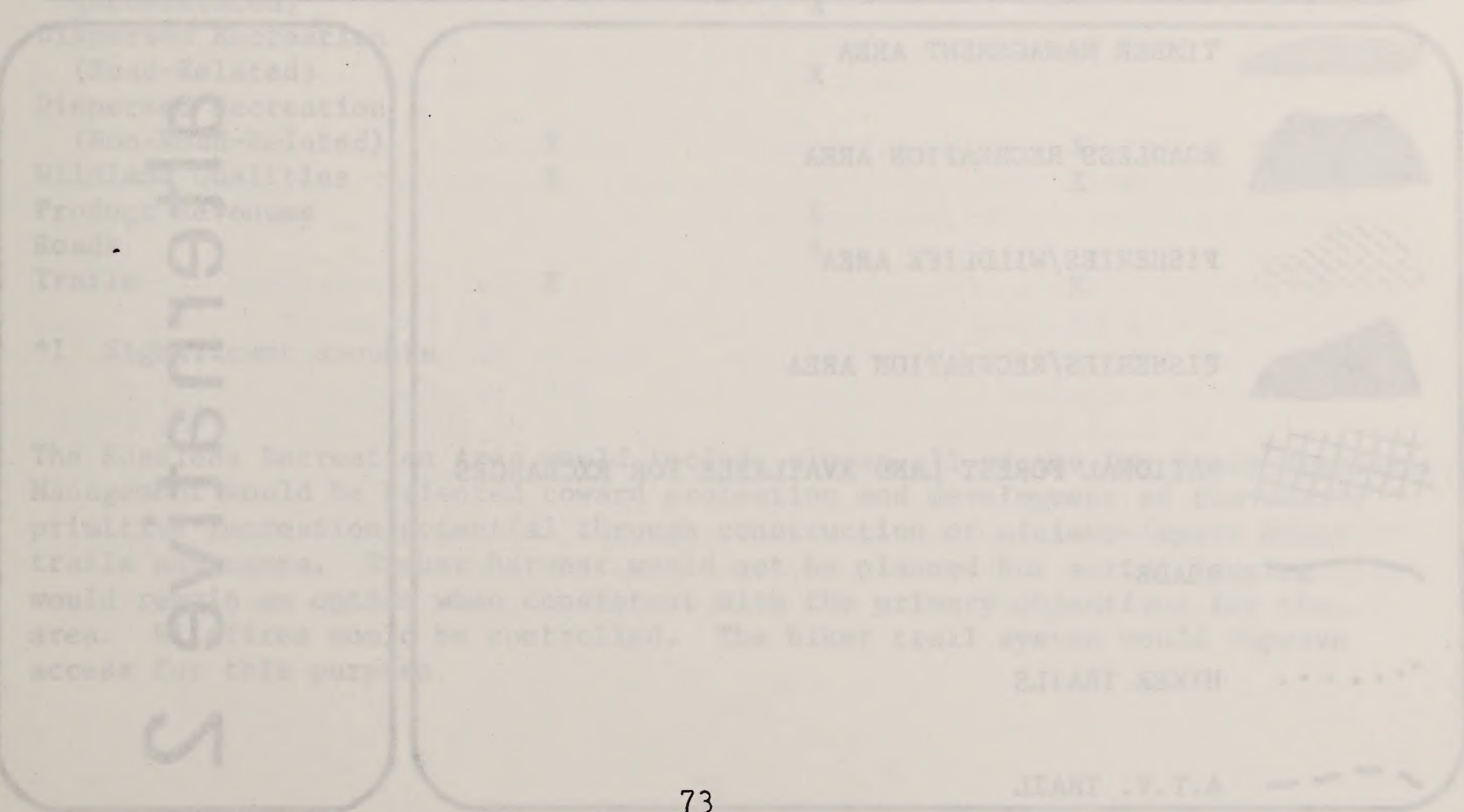
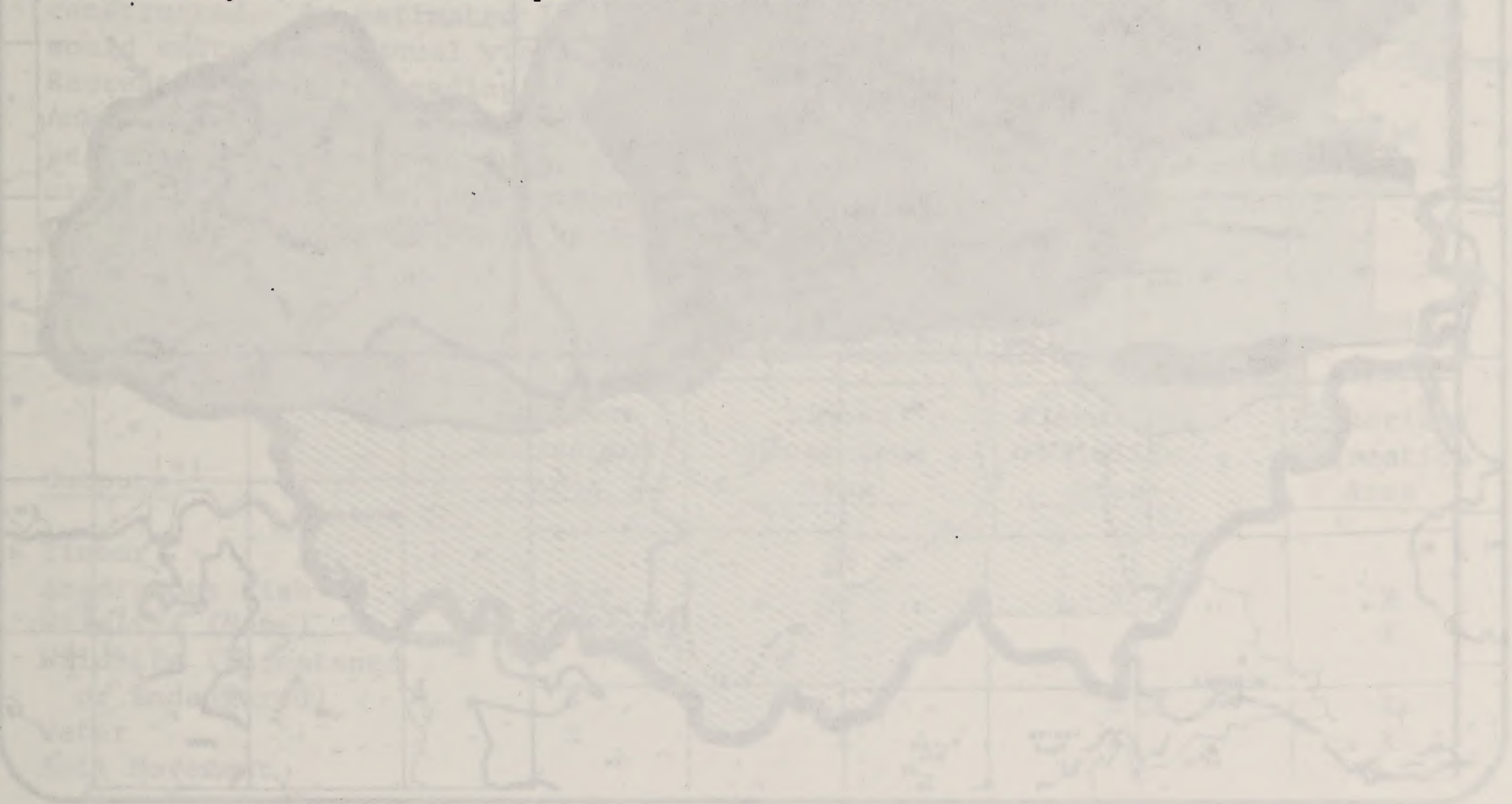
After careful analysis and evaluation, Alternative 1 was not chosen as the proposed action. The primary reasons included the following:

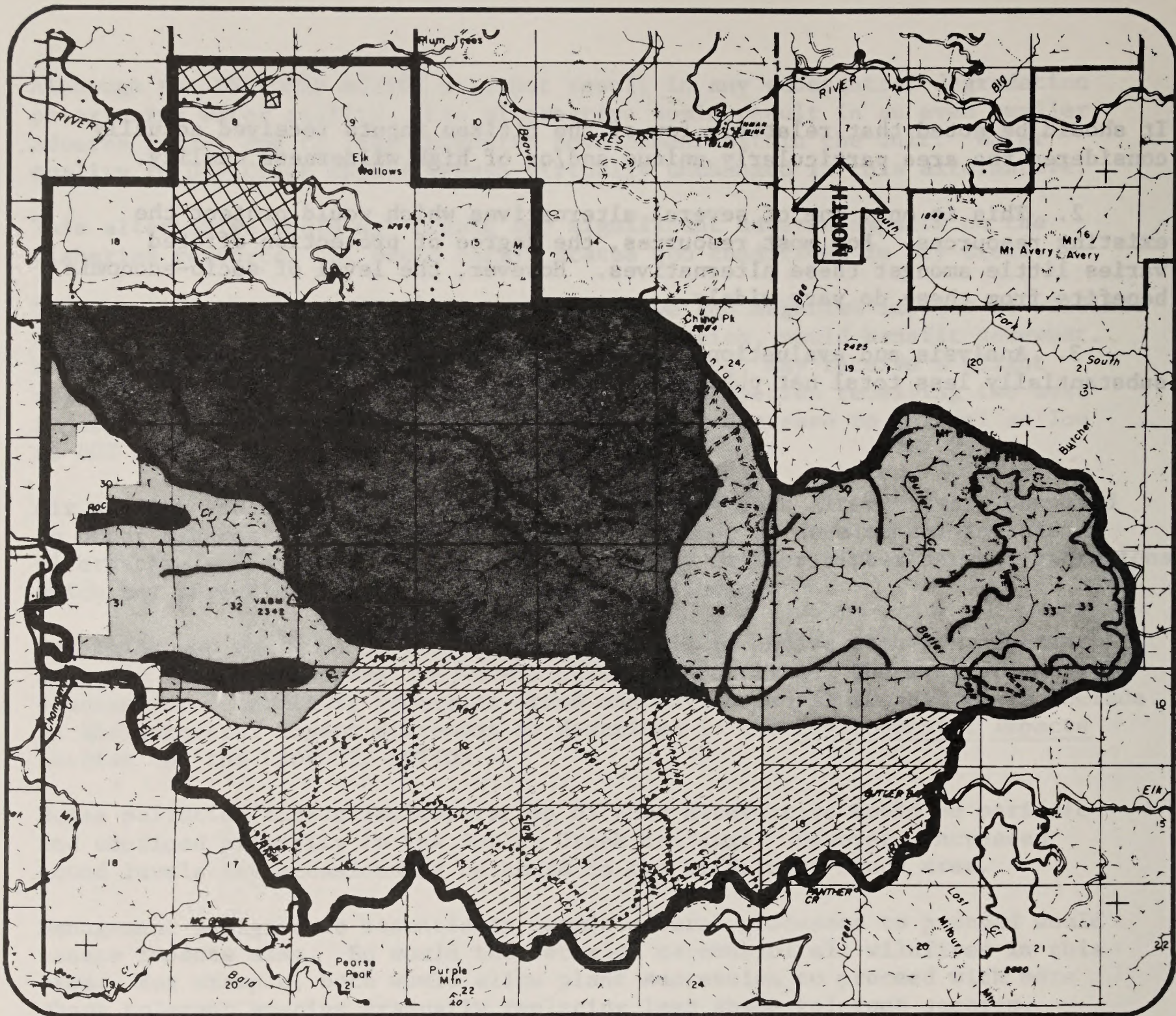
1. Both the multi-discipline, on-the-ground study of the Unit and the Roadless Area Review (RARE) process concurred in concluding that the suitability to Wilderness, and the quality of any such Wilderness within the Unit's roadless area is not better than mediocre. In fact the evaluation of quality in the RARE process, based on some 14 variables, placed inventoried roadless area B11-Grassy Knob in the lower 20% of all 1,449 roadless areas based on this criteria. Subsequent analysis confirms that potential benefits would be relatively low, while opportunity costs would be relatively high.

It should be noted that relatively few of the citizen inputs received actually considered the area particularly unique and/or of high wilderness quality.

2. This is only one of several alternatives which would protect the existing resources. For most resources, the degree of protection offered varies little amongst these alternatives. However, the level of socio-economic benefits from these do vary widely.

3. Analysis and evaluation indicate that this alternative would generate substantially less total net public benefits than the PROPOSED ACTION.

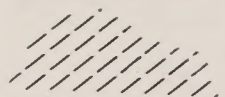




TIMBER MANAGEMENT AREA



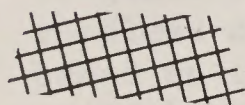
ROADLESS RECREATION AREA



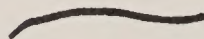
FISHERIES/WILDLIFE AREA



FISHERIES/RECREATION AREA



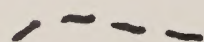
NATIONAL FOREST LAND AVAILABLE FOR EXCHANGES



ROADS



HIKER TRAILS



A.T.V. TRAIL

alternative 2

Alternative 2: Under this alternative, 8,100 acres, primarily in the Dry Creek drainage, would be designated a Roadless Recreation Area. Some 21 miles of recreational hiking trails, mostly along Dry Creek, would be planned. This trail network would be connected with the 12-mile ridgetop hiker trail system planned for the southern portion of the Planning Unit. This system would access the 6,400 undeveloped acres in the Fisheries/Wildlife Area bordering 13 miles of the Elk River. Sixty eight hundred acres, mostly in the Butler Creek drainage and along the western end of the Unit, would be accessed for timber management. This would require that a 24 mile road system (including 15 miles of new construction) be completed over a 30 year period. A 4 mile ATV trail for tailhold access during timber harvest operations may also be constructed. An estimated 186 million board feet of timber on these acres would sustain an annual yield of approximately 2.7 million board feet. Fisheries/ Recreation Areas extending 1/8 mile on either side of both Rock Creek and Anvil Creek would cover 300 acres. Basically, these undeveloped areas would be managed primarily to fully protect fishery values in these streams. In order to consolidate land holdings, 500 acres of National Forest land in three separate tracts would be available for exchange.

TYPE OF OUTPUTS UNDER ALTERNATIVE #2

<u>Outputs</u> *1	<u>Roadless Recreation Area</u>	<u>Timber Management Area</u>	<u>Fisheries/ Wildlife Area</u>	<u>Fisheries/ Recreation Area</u>
Timber		X		
Anadromous Fish	X	X	X	X
Wildlife (Game)		X		X
Wildlife (Threatened or Endangered)	X		X	X
Water	X	X	X	X
Soil Movement (Accelerated)		X		
Dispersed Recreation (Road-Related)		X		
Dispersed Recreation (Non-Road-Related)	X		X	X
Wildland Qualities	X		X	X
Product Revenues		X		
Roads		X		
Trails	X		X	

*1 Significant amounts

The Roadless Recreation Area would include almost all of the Dry Creek drainage. Management would be oriented toward protection and development of the area's primitive recreation potential through construction of minimum-impact hiker trails and camps. Timber harvest would not be planned but aerial logging would remain an option when consistent with the primary objectives for the area. Wildfires would be controlled. The hiker trail system would improve access for this purpose.

The Fisheries/Wildlife Area would remain roadless and basically undeveloped under this alternative. The primary objectives of management would be to protect the existing fisheries, wildlife, watershed, and aesthetic values and to develop the area's primitive recreation potential. A 12-mile, minimum-impact hiker trail system would be planned to help accomplish these objectives. Timber harvest would not be planned but aerial harvest would remain an option in the event of catastrophic damage from fire, wind, insects, disease, or other natural factors.

Some 6,800 acres, primarily in the Butler Creek, Anvil Creek, and Rock Creek drainages, would be developed for intensive timber management. Development of this acreage would require the same stringent regulations and sophisticated systems and techniques as those discussed in the PROPOSED ACTION.

A total of 300 acres extending 1/8 mile on either side of both Anvil Creek and Rock Creek would be designated Fisheries/Recreation Areas. The primary objective in these areas would be to fully protect the existing fisheries resources and water quality. Developments would not be planned but would remain an option.

Three separate tracts of National Forest land (totalling 500 acres) north of the main block would be available for exchanges. This would help consolidate holdings into a more manageable block.

ESTIMATED ECONOMIC ACTIVITY SUPPORTED BY ALTERNATIVE #2

	<u>Local</u>	<u>Non-Local</u>	<u>Total</u>
Timber-Related Jobs	30	15	45
Fisheries & Recreation Related Jobs	<u>17</u>	<u>18</u>	<u>35</u>
Total Jobs	47	33	80
Annual Economic Impact (thousand dollars)	540	370	910

The major impact from implementation of this alternative would be on the socio-economic environment of the local area. Much smaller relative impacts would be generated at the regional level.

The Unit's present relative contribution to the Forest's programmed harvest would be reduced by 51% to 2.7 million board feet. An estimated 30 jobs in the local area and 15 jobs elsewhere in western Oregon would be directly or indirectly supported by the annual yield. This represents an estimated loss of 9 existing jobs and accounts for only 51% of the potential jobs under the present land allocations.

Employment and other economic activity generated by the Unit's fisheries resource will remain virtually unchanged from the status quo under this alternative. Recreational use of the Unit probably would increase, resulting

in slightly greater levels of recreation resource-generated economic activity. However, the level would remain relatively low. Forest Service expenditures for land management activities would decrease. Unit contributions to county government revenues would be greatly reduced.

An overall estimate of the total number of jobs directly or indirectly generated by the Planning Unit under this alternative is 47 local jobs and 33 jobs elsewhere in western Oregon. The total value to the economy of wages, salaries, profits, government expenditures, and County revenues (25% formula) directly or indirectly attributable to the Unit, is estimated at more than \$0.9 million each year. However, as mentioned before, these are ballpark estimates based on what little information is available. They are primarily useful in making relative comparisons amongst alternatives.

Realization of the 2.7 million board feet annual yield will require timber harvest on an average of 62 acres per year. Depending on timber type, the acreage could vary in any given year from 40 to 225 acres in theory. However, technical and economic realities will keep the actual harvested acreage per year near the average. Also, economic and technical reasons would vary this figure. With this relatively small annual yield, harvest intervals of 2-4 years are likely.

The same quality control regulations and quality control monitoring would be used in this alternative as in the PROPOSED ACTION. The same road construction, timber harvest, and intensive timber management techniques would also be used.

The accelerated soil erosion rate would be similar to that in the PROPOSED ACTION. However, the distribution would differ and the total volume would decrease due to the fewer acres under development in this alternative. The primary change would be that little, if any, accelerated soil erosion would occur in the Dry Creek drainage.

This alternative, like the PROPOSED ACTION and alternative 1 would not result in any substantial degradation of existing water quality. The impact would be similar to the PROPOSED ACTION in the Elk River watershed and similar to Alternative 1 in the Dry Creek watershed.

This alternative would create very slight adverse impacts to the fisheries resource. Unit carrying capacity for anadromous fish may be reduced slightly. However, status-quo conditions would be maintained in the Dry Creek drainage.

This alternative would have positive and negative impacts on wildlife species intermediate between the PROPOSED ACTION and Alternative 1. Most species, including most game species, would benefit moderately. Many non-game, and particularly the threatened species, would suffer some adverse impacts. For example, Unit carrying capacity for the northern spotted owl would gradually decrease over 50-60 years to a level as low as 75% of that at present. The impact on bald eagles would be minimal to non-existent.

This alternative would not substantially alter existing air quality. Compared to most other alternatives, this alternative has a relatively small amount of development. This would mean that fewer and smaller polluting activities would be required.

As in the PROPOSED ACTION and the other alternatives, herbicide use would be required on a periodic basis in intensive timber management areas. The evaluation process for determining treatment areas and environmental impacts would include an Environmental Impact Statement as described in the Environmental Impacts section for the PROPOSED ACTION.

Noise pollution would be periodic and confined primarily to drainages under development. However, increased sound levels may occasionally be heard in the Roadless Recreation Area.

Management designed to essentially permit natural processes to proceed and to control wildfires in such areas creates impacts also. These have already been discussed in earlier alternatives.

Alternative 2 was not selected as the proposed action. Careful analysis and evaluation indicate that this alternative would generate substantially less total public benefits than the PROPOSED ACTION. Specifically, relative to the PROPOSED ACTION, the slightly less adverse environmental impacts and slightly greater primitive recreation potential are more than offset by the major adverse impacts on the socio-economic environment.

Alternative 4: Under this alternative, 16,250 acres would be accessed for timber management. This would require completion of a 46 mile ridgetop road system (37 miles of which would be new construction) over a 30 year period. A 4 mile ATV trail for tailhold access during timber harvest operations may be constructed. An estimated 496 million board feet of timber would sustain an annual yield of approximately 6.6 million board feet. A 5,600-acre Fisheries/Wildlife Area adjacent to 13 miles of the Elk River would be designated. This area would remain roadless and be managed primarily to protect the existing fisheries, wildlife, and aesthetic resources. Limited aerial timber harvest in this area may produce an additional 0.3 to 0.7 million board feet per year under the provision of this alternative. The total estimated annual yield in this alternative would then range between 6.9 to 7.3 million board feet. A 12-mile ridgetop hiker trail system would be planned. It would provide administrative and recreational access to this 5,600-acre area. A 1.5-mile recreation hiker trail would be constructed along lower Dry Creek to Velvet Flat. Some of the flats along the creek would be developed for primitive camps. A 250-acre Fisheries/Recreation Area extending 1/8 mile on either side of lower Dry Creek would remain in its natural state.

TYPE OF OUTPUTS UNDER ALTERNATIVE #4

<u>Outputs</u> ^{*1}	<u>Timber Management Area</u>	<u>Fisheries/ Wildlife Area</u>	<u>Fisheries/ Recreation Area</u>
Timber	X	X	
Anadromous Fish	X	X	X
Wildlife (Game)	X	X	X
Wildlife (Threatened or Endangered)		X	X
Water	X	X	X
Soil Movement (Accelerated)	X	X	
Dispersed Recreation (Road-Related)	X		
Dispersed Recreation (Non-Road-Related)		X	X
Wildland Qualities		X	X
Product Revenues	X	X	
Roads	X		
Trails		X	X

*1 Significant amounts

Virtually all of the most productive timber-growing land would be accessed for intensive timber management under this alternative. The 16,250 acres represent less than 74% of the Unit acreage. However, these acres would support 89% of the Unit's total potential annual yield. Good access would be provided by the 46-mile ridgetop road system. The less productive land in the Fisheries/Wildlife Area, better suited to less intensive timber management, would be so managed.

While the roadless Fisheries/Wildlife Area would continue to be managed primarily to protect the existing fisheries, wildlife, and aesthetic resources under this alternative, timber harvest would be more extensive than in the PROPOSED ACTION or Alternative 2. However, such harvesting would be limited to aerial systems and no access roads would be constructed. A 12-mile hiker trail system located primarily in this area, would also be planned. It would provide administrative and recreational access.

The primary objectives of the 250-acre Fisheries/Recreation Area along lower Dry Creek would be the protection of the existing fisheries and aesthetic resources and the development of the primitive recreation potential. A 1.5-mile, minimum-impact hiker trail system would be constructed along with several minimum-impact primitive campsites. The 5-6 acre Velvet Flat above Dry Creek would be the final primitive camp and the terminus of the foot trail.

ESTIMATED ECONOMIC ACTIVITY SUPPORTED BY ALTERNATIVE #4

	<u>Local</u>	<u>Non-Local</u>	<u>Total</u>
Timber-Related Jobs	74	37	111
Fisheries & Recreation Related Jobs	<u>16</u>	<u>16</u>	<u>32</u>
Total Jobs	90	53	143
Annual Economic Impact (thousand dollars)	1,040	620	1,660

This alternative would create greater impacts to the socio-economic environment and to the existing resources than the PROPOSED ACTION.

The Unit's present relative contribution to the Forest's programmed annual harvest would be increased by 20% to 6.6 million board feet. An additional 0.3 to 0.7 million board feet outside of the regular programmed harvest may be realized each year from management on the Fisheries/Wildlife Area under this alternative. Given the objectives of this area, a 25% increased contribution to the 6.9 million board foot level would be most likely under this alternative.

An estimated 74 local jobs and 37 jobs elsewhere in western Oregon would be directly or indirectly support by the annual cut. Additional jobs from any harvests in the Fisheries/Wildlife Area under this alternative would also be supported. This represents an estimated increase of at least 57 jobs over existing levels and accounts for a 25% increase over the job potential under the present land allocations.

Employment and other economic activity generated by the Unit's fisheries resource may decrease somewhat from the status quo under this alternative. Similarly, recreation resource-generated economic activity may decline somewhat. However, Forest Service expenditures for land management activities would increase somewhat. Finally, Unit contributions to county government revenues would increase substantially.

An overall estimate of the total number of jobs directly or indirectly generated by the Planning Unit under this alternative is 90 local jobs and 53 jobs elsewhere in western Oregon. The total value to the economy of wages, salaries,

profits, government expenditures, and County revenues (25% formula) directly or indirectly attributable to the Unit is estimated at nearly \$1.7 million each year. These are ballpark estimates based on the often sketchy available information. They are primarily useful in making relative comparisons amongst alternatives.

Harvest of the 6.5 million board feet regular annual yield would be accomplished on an average of 144 acres per year. Depending on timber types this could vary from 90 to 540 acres but technical and economic realities will keep the actual harvested acreage per year to near the average. Economic and technical reasons would vary this annual figure but harvest intervals with this size cut would likely be 1-2 years. An additional 10-25 acres could be harvested annually with aerial systems from the Fisheries/Wildlife Area under this alternative.

Similar quality control regulations and quality control monitoring would be used in this alternative as in the PROPOSED ACTION. The same basic road construction, timber harvest, and intensive timber management techniques would also be used.

The accelerated erosion rate would be similar to that in the PROPOSED ACTION. However, it would be more widespread and the total volume would increase substantially. The primary area of increase would be in the Dry Creek drainage. Some degradation of existing water quality would occur under this alternative. This could be expected throughout most of the Unit but would likely be most dramatic in the Dry Creek drainage. Quality control regulations and techniques should, in general, contain such impacts within the water quality standards listed in the Water section of the Description.

Compared to the PROPOSED ACTION and Alternatives 1 and 2, this alternative would create relatively high adverse impacts to the fisheries resource - particularly in Dry Creek. However, compared to Alternative 5, this alternative would create a relatively moderate level of adverse impacts. Although a high percentage of existing fish populations would be sustained under this alternative, a significant decline from existing levels would be probable. Similarly, it is probable that implementation of this alternative would create slightly adverse impacts on the fish hatchery operation just downstream from the Unit. These would be in the form of slightly decreased water quality characteristics in the Elk River water used by the hatchery.

This alternative would create greater positive and greater negative impacts to wildlife species than the PROPOSED ACTION. Most species, including most game species, would benefit substantially from the habitat modification under this alternative. Many non-game species, particularly the northern spotted owl, would suffer substantial adverse impacts. For example, Unit carrying capacity for this bird would gradually decrease over a period of 50-60 years to a level as low as 30% of that at present. Some possibility exists that all suitable habitat for this species could eventually be eliminated under this alternative. However, the habitat requirements of other species such as the bald eagle are much more compatible with some development activities. The impact on these species would be much less severe.

This alternative would not substantially alter existing air quality. The minor, periodic impacts would be slightly greater than those under the PROPOSED ACTION. However, they would be controlled by the same quality control regulations and techniques as in the PROPOSED ACTION and the other alternatives.

Due to the greater number of acres under intensive timber management in this alternative, herbicide use would increase somewhat. However, its usage would be subject to the same quality controls and Environmental Impact Statement process as described in the Environmental Impacts section for the PROPOSED ACTION.

Noise pollution would increase throughout the Unit to a greater degree and with a greater frequency of occurrence under this alternative compared to the PROPOSED ACTION. However, its occurrence would continue to be periodic while its greatest intensities would be confined to areas being developed.

Alternative 4 was not selected as the proposed action. Careful analysis and evaluation indicate that this alternative would generate significantly less total net public benefits than the PROPOSED ACTION. Specifically, relative to the PROPOSED ACTION, the increased socio-economic benefits under this alternative are more than offset by the substantial adverse impact on the existing quantitative and qualitative levels of most non-timber resources.

Alternative 5: Under this alternative, the entire 22,100 acres would be accessed for timber management with the maximum feasible ridgetop road system. This would require completion of a 56 mile ridgetop road system (47 miles of which would be new construction) over a 30 year period. A 4 mile ATV trail for tailhold access during timber harvest operations may also be constructed. However, even under this road system, about 20% of the 572 million board feet accessed would be helicopter-logged. An annual yield of approximately 7.4 million board feet would be generated under this alternative.

TYPE OF OUTPUTS UNDER ALTERNATIVE #5

<u>Outputs</u> ^{*1}	<u>Timber Management Area</u>
Timber	X
Anadromous Fish	X
Wildlife (Game)	X
Wildlife (Threatened or Endangered)	
Water	X
Soil Movement (Accelerated)	X
Dispersed Recreation (Road-Related)	X
Dispersed Recreation (Non-Road-Related)	
Wildland Qualities	
Product Revenues	X
Roads	X
Trails	

*1 Significant amounts

The primary objective in the Unit under this alternative would be intensive timber management on all acres containing conifer types and on all hardwood type acres suitable for conversion. Quality control regulations and techniques would be applied to minimize degradation of other resources.

ESTIMATED ECONOMIC ACTIVITY SUPPORTED BY ALTERNATIVE #5

	<u>Local</u>	<u>Non-Local</u>	<u>Total</u>
Timber-Related Jobs	83	41	124
Fisheries & Recreation Related Jobs	13	14	27
Total Jobs	96	55	151
Annual Economic Impact (thousand dollars)	1,120	650	1,770

This alternative would create greater impacts to the socio-economic environment and to the existing resources than the PROPOSED ACTION or any of the other alternatives.

The Unit's present relative contribution to the Forest's programmed harvest would be increased by 35% to 7.4 million board feet. An estimated 83 local jobs and 41 jobs elsewhere in western Oregon would be directly or indirectly supported by the annual cut. This represents an estimated increase of 70 jobs over existing levels and accounts for a 39% increase over the job potential under the present land allocations.

Employment and other economic activity generated by the Unit's fisheries and recreation resources probably would decrease substantially under this alternative. The fish hatchery operation on the Elk River, just downstream from the Unit, could be in some degree of jeopardy from decreased water quality, as quality under present conditions periodically becomes marginal for operations. Even a reduction in output from the near-million dollar hatchery would result in substantial economic impacts. For example, the \$834,000 facility would not be fully used and fewer healthy fish would be produced. Future anadromous fish runs likely would be reduced. Even a 15% reduction of this nature would represent a loss of \$225,000 a year.

Forest Service expenditures for land management activities would increase substantially above those for the PROPOSED ACTION, and Unit contributions to county government revenues would increase by nearly 50% over those generated by the PROPOSED ACTION.

An overall estimate of the total number of jobs directly or indirectly generated by the Planning Unit under this alternative is 96 local jobs and 55 jobs elsewhere in western Oregon. The total value to the local economy of wages, salaries, profits, government expenditures, and County revenues (25% formula) directly or indirectly attributable to the Unit is estimated at nearly \$1.8 million each year. However, as mentioned in each of the other alternatives, these are intended as ballpark estimates, primarily useful in making relative comparisons amongst alternatives.

An average of 186 acres would be harvested annually to attain the 7.4 million board feet annual yield. Depending on timber types this could vary from 105 to 615 acres, however technical and economic realities would ensure that the actual acreage harvested each year would be near the average. Again, economic and technical reasons would vary the actual harvest each year but harvest intervals of 1-2 years would be probable.

Management activities under this alternative would be subject to the same basic timber harvest, road construction, and intensive timber management techniques as those to be used in the PROPOSED ACTION and the other alternatives. Also, certain basic quality control regulations would be in effect. However, under this alternative, these measures would be insufficient to consistently avoid substantial degradation of several resources. This is due to a number of factors including the following: 1. Virtually all of the land added to the intensive timber management area beyond that contained in Alternative 4 is poorly suited for such management; 2. Several economically and environmentally marginal roads would be constructed only under this alternative.

The accelerated erosion rate would be significantly greater than that under the PROPOSED ACTION. Further it would be more widespread. The total volume in the Unit would be substantially higher than that from the PROPOSED ACTION or any other alternative (with the possible exception of Alternative 6).

Existing water quality would be substantially degraded under this alternative. The impact would occur in both Dry Creek and Elk River. Quality control regulations and techniques would minimize potential damages but would be insufficient to consistently avoid substantial water quality degradation under this alternative.

The fisheries resource would receive relatively high adverse impacts from implementation of this alternative. Although a high percentage of the existing fish populations should be sustained, a substantial decline from existing levels is probable. Also, the risk of catastrophic damage to this resource would be increased from virtually zero to a much higher level.

Similarly, it is probable that implementation of this alternative would adversely affect the operation of the Elk River fish hatchery just downstream from the Unit. These impacts would be in the form of lower quality river water for hatchery use.

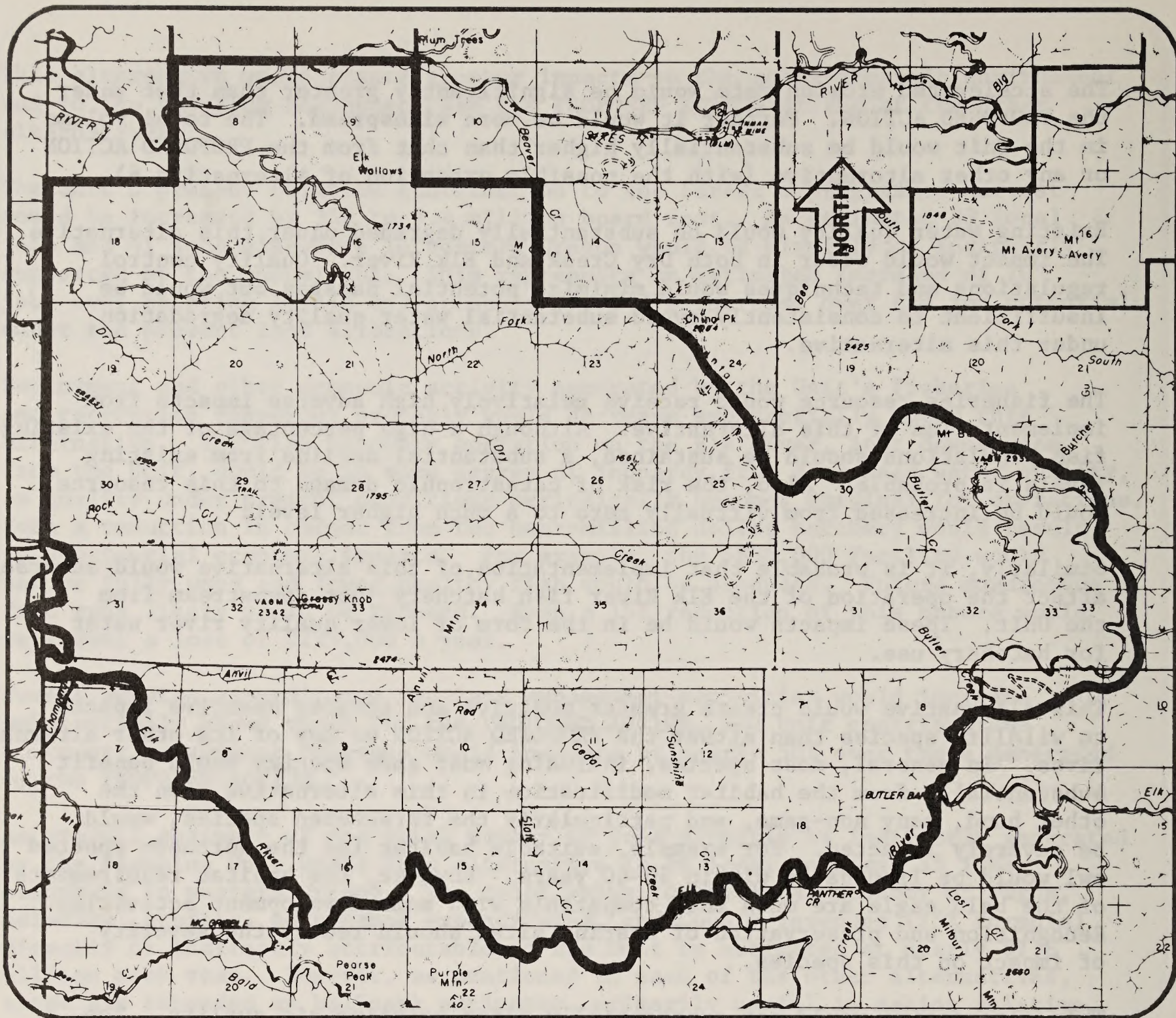
This alternative would create greater positive and greater negative impacts to wildlife species than either the PROPOSED ACTION or any of its other alternatives. In general, most species, including most game species would benefit substantially from the habitat modification in this alternative. On the other hand, many non-game, and particularly the threatened species, would be severely impacted. For example, suitable habitat for the northern spotted owl would be liquidated within 50-60 years. However, the habitat requirements of the bald eagle are much more compatible with some development activities. Recognition and preservation of nesting sites should reduce the severity of impact on this species.

This alternative would not substantially alter existing air quality. The minor, periodic impacts would be somewhat greater than those under the PROPOSED ACTION. However, they would be controlled by the same quality control regulations and techniques as in the PROPOSED ACTION and the other alternatives.

Due to the greater number of acres under intensive timber management in this alternative, herbicide use would increase. However, its usage would be subject to the same quality controls and Environmental Impact Statement process as described in the Environmental Impacts section for the PROPOSED ACTION.

Noise pollution would increase throughout the Unit to a greater degree and with a greater frequency of occurrence under this alternative compared to the PROPOSED ACTION. However, its occurrence would continue to be periodic.

Alternative 5 was not selected as the proposed action. Careful analysis and evaluation indicate that this alternative would generate substantially less total net public benefits than the PROPOSED ACTION. Specifically, relative to the PROPOSED ACTION, the increased socio-economic benefits under this alternative are more than offset by the substantial adverse impact on the existing quantitative and qualitative levels of most non-timber resources.



NO COMPREHENSIVE PLAN

alternative 6

Alternative 6: Under this alternative, no action would be taken to develop a comprehensive land use plan for the Unit. This alternative would permit specific land use allocations to evolve through a series of largely uncoordinated land use and functional decisions.

This alternative could preserve land use options for some years over part or all of the Unit. Should this occur, new resource data, new technology, and a different mix of public values could evolve. Subsequent land use allocations could be responsive to that new situation. However, it is more probable that development of the Unit would accelerate because the Unit contains the last sizeable undeveloped area on the Powers Ranger District. Development without a comprehensive land use plan would tend to enhance short-term expediency at the expense of long-term flexibility, costs, and soundness of land use allocations.

Development of this nature would be particularly hazardous in this Planning Unit where both the resource values and the potential for severe environmental impacts are high. Short-term expedient decisions elsewhere have proven to be more costly in terms of both funds expended and environmental impacts. The net public benefits from this alternative would be at a much lower level than those obtained from the PROPOSED ACTION.

Comparison of the PROPOSED ACTION and its Alternatives

Land-use decision-making involves the analysis and evaluation of a startling number of variables. These include economic, environmental, physical, and other technical factors and public input. The latter has been examined in the "Consultation With Others" section (Section VII in this Environmental Impact Statement). The matrix beginning on the next page provides comparative data for most of the other important variables.

Estimates are based on the best available data obtained from on-the-ground study and from other sources. Non-numerical estimates were made by the best-qualified Forest expert in each case. For example, estimates about the fisheries resource were made by the Siskiyou National Forest's fishery biologist. The most important aspect about all of these estimates is their relative values. Numerous factors can vary the absolute values.

Component variables in the matrix are assigned to a composite group of concerns to aid analysis. These groupings are: administration/accessibility; economic; environmental; and physical production. The importance of individual variables in each composite varies considerably. For example, in dollar terms, the annual fish harvest appears to be 400-500 times more valuable than the annual deer harvest. Further, the importance placed on each group of concerns will vary among citizens. Each reader should analyze and evaluate the data in this matrix along with the rest of the document. This will aid the reader in better defining the tradeoffs which must be known for sound decision-making.

Alternative 6 (no action to develop a comprehensive land use plan) is not included in the matrix. Land use allocations under this alternative would evolve through a series of largely uncoordinated land use and functional decisions. Therefore, one could only speculate at this time on the output estimates for the matrix. As a speculative estimate at this time for purposes of general orientation, it seems probable that land allocations similar to Alternative 5 would eventually evolve.

Non-numerical symbols used in the matrix are:

- H High relative impact
- M Moderate relative impact
- S Slight relative impact
- ↑ Favorable trend
- Virtually unchanged
- ↓ Unfavorable trend

COMPARATIVE DATA FOR THE PROPOSED ACTION AND ITS ALTERNATIVES

<u>Administration/Accessibility</u>	<u>Proposed Action</u> (Alt. 3)	<u>Alt. 1</u>	<u>Alt. 2</u>	<u>Alt. 4</u>	<u>Alt. 5</u>
Area Under Intensive Timber Management (acres)	11,700	4,500	6,800	16,250	22,100
Area Under Other Classifications (acres)	10,400	17,600	15,300	5,850	0
% of Volume Skyline-Logged	76%	98%	76%	68%	80%
% of Volume Helicopter- Logged	24%	2%	24%	32%	20%
Total Road System (miles)	40	20	24	46	56
Area Under Intensive Timber Management Per Access Mile (acres)	290	230	280	350	390
Foot Trail Access (miles)	26	?	33	14	0
Risk of Fire Ignition	↓ H	↓ S	↓ M	↓ H	↓ H
Accessibility for suppression of Fire	↑ M	↑ S	↑ S	↑ M	↑ H
Fuel Buildup	↓ M	→	↓ S	↓ H	↓ H

COMPARATIVE DATA FOR THE PROPOSED ACTION AND ITS ALTERNATIVES

<u>Economic</u>	<u>Proposed Action</u> (Alt. 3)	<u>Alt. 1</u>	<u>Alt. 2</u>	<u>Alt. 4</u>	<u>Alt. 5</u>
Rate of Return	15.51%	31.95%	38.10%	10.53%	21.43%
Present Net Worth at 6.88%	2,050,000	2,182,000	1,993,000	1,378,000	2,227,000
Annual Benefits Minus Cost at 6.88%	141,000	150,000	137,000	95,000	153,000
Benefit/Cost Ratio at 6.88%	1.558	2.358	1.946	1.257	1.395
Gross Value of A.Y. (Sell Value \$/Year)	1,078,000	440,000	594,000	1,452,000	1,628,000
Net Value of A.Y (Minimum Average Stumpage \$/Year)	185,000	94,000	106,000	258,000	294,000
Annual Net Value of Fish Harvest (\$) (Present Value = \$441,000)	↓ S	→	↓ S	↓ M	↓ H
Effect on Elk River Fish Hatchery	→	→	↓ S	↓ M	↓ H
Annual Net Value of Deer Harvest (\$)	600	400	500	700	900
Annual Regeneration Investment (\$)	25,000	10,000	14,000	35,000	44,000
Rate of Return on Regen. Invest. (\$)	5.49%	5.93%	5.39%	5.43%	5.43%
Total Job Estimate (all jobs)	118	69	80	143	151
Annual Economic Impact Estimate (\$)	1,360,000	780,000	910,000	1,660,000	1,770,000

COMPARATIVE DATA FOR THE PROPOSED ACTION AND ITS ALTERNATIVES

<u>Environmental</u>	<u>Proposed Action</u> (Alt. 3)	<u>Alt. 1</u>	<u>Alt. 2</u>	<u>Alt. 4</u>	<u>Alt. 5</u>
Area Under Intensive Timber Management (acres)	11,700	4,500	6,800	16,250	22,100
Total Road System (miles)	40	20	24	46	56
Foot Trail Access (miles)	26	?	33	14	0
Road System and Landings (acres)	280	150	180	320	380
Accelerated Soil Loss	↓ M	↓ S	↓ S	↓ M	↓ H
Water Quality	↓ S	↓ S	↓ S	↓ M	↓ H
Water Runoff Timing	↓ S	↓ S	↓ S	↓ M	↓ M
Fisheries Habitat	↓ S	↓ S	↓ S	↓ M	↓ H
Game Habitat	↑ M	↑ S	↑ S	↑ H	↑ H
Threatened and/or Endangered Species Habitat	↓ M	↓ M	↓ M	↓ H	↓ H
Air Quality	↓ S	→	→	↓ S	↓ S
Noise Pollution	↓ M	↓ S	↓ S	↓ H	↓ H
Maintenance of Established Landscape Character	↓ M	↓ S	↓ M	↓ H	↓ H
Effect on Elk River Road Seen Area	→	→	↓ S	↓ S	↓ H
Effect on Dry Creek Seen Area	↓ S	→	→	↓ H	↓ H
Preservation of Substantially Unaltered Environment	↓ M	↓ S	↓ S	↓ H	↓ H
Potential for Loss of Rare Ecosystems	↓ M	↓ S	↓ S	↓ H	↓ H

COMPARATIVE DATA FOR THE PROPOSED ACTION AND ITS ALTERNATIVES

Physical Production	Proposed Action (Alt. 3)	Alt. 1	Alt. 2	Alt. 4	Alt. 5
Total Stumpage Accessed (MBF)	362,000	133,000	186,000	496,000+	573,000
Estimated Potential (MBF)	492,000	210,000	273,000	658,000+	724,000
Annual Yield (MBF)	4,900	2,000	2,700	6,600+	7,400
Annual Commercial Fish Harvest (fish) (Present Harvest = 9,800)	↓S	→	↓S	↓M	↓H
Annual Sport Fish Harvest (fish) (Present Harvest = 5,300)	↓S	→	↓S	↓M	↓H
Annual Deer Harvest (deer)	16	10	14	20	24
Primitive Recreation Potential	↑M	↑S	↑M	↓H	↓H
Developed Recreation Potential	↑M	↑S	↑S	↓S	↓M

VII. CONSULTATION WITH OTHERS

Input from sources outside of the Forest Service has been obtained throughout the planning process for this Mt. Butler-Dry Creek Planning Unit.

Some of the first input came from local residents and local Oregon Fish Commission employees during the on-the-ground multi-discipline study. Interviews with these people produced a wealth of data - particularly with respect to fisheries management in the area and to local history.

The Roadless Area Review (RARE) process was another early opportunity for input. On March 13 and March 25, 1972, public meetings were held in Grants Pass and Medford, Oregon, respectively, to receive public comment on roadless areas of 5,000 acres or more in the Forest. Of 3,626 persons providing inputs during this period of time, 36% were in favor of further study of the roadless areas for possible Wilderness classification while 64% were opposed to such action. Inventoried area B11-Grassy Knob, which is part of the Planning Unit was one of several roadless areas which did not receive any specific comments or mention. Neither were any comments received on the area from the Chief's Draft Environmental Statement on the selection of new wilderness study areas.

An information brochure on the Unit was sent to about 150 names on the Forest's mailing list in early February, 1974. This list included nearly 40 newspapers, radio stations, television stations, and other media in Oregon and northern California. Six weeks later, on Saturday, March 23, 1974, a full day workshop on the Unit was attended by more than 40 citizens from all parts of southwest Oregon. Most input received during that gathering expressed skepticism that fishery, soil, and water resources could be adequately protected if extensive timber harvest took place within the Unit.

A brochure detailing a range of 5 alternatives and reflecting many of the concerns expressed at the workshop was made available to the general public following a June 24, 1974 news release. The Forest's mailing list for this included additional names and totalled approximately 175. In all, over 850 brochures were distributed while several thousand response forms were available.

362 responses were received. Each of these respondents had the opportunity to express their opinion on each of the five alternatives, suggest a different alternative, and give an unlimited number of reasons to support their opinions. As a result, a total of 1,464 opinions, 1,509 reasons, 100 modifications, and 11 different alternatives were received. The volume and complexity of the response required analysis by the Codinvolve System. A summary of the opinions expressed is given in the following Table 2. Since a different numbering system was used in the alternatives brochure, Table 1 is required to correlate the two numbering systems. (Also, minor modifications were made in several of the alternatives following the analysis of public input.) A more detailed analysis of the response, including the comments received, can be found in Appendix F.

After evaluation of all relevant information, including the reasons and opinions expressed by interested citizens, alternative 3 was selected as the PROPOSED ACTION for the Draft Environmental Statement (DES). This document was made available to interested persons on March 24, 1975. The customary 60 day period allowed for interested persons to respond was extended until July 1, 1975 in response to requests from the public. 1,177 people responded with personal letters, form letters, and petitions. A summary of the opinions expressed is given in the following Table 3. Additional information is summarized in Appendix G. In addition, each of the personal letters and petitions and a copy of each form letter are displayed in Appendix H.

In response to various concerns expressed by segments of the general public, the PROPOSED ACTION shown in the DES was re-evaluated and modified for this Final Environmental Statement (FES).

Readers should be aware of one important point regarding public input. Public input was not intended to be a vote count, nor was it so considered. Therefore, the reader would be ill-advised to limit his review of public input to the following tabular summaries. A full review of Appendices F, G, and H is recommended.

The remainder of this section is divided into three parts:

- A. Summaries of the public responses to the alternatives brochure of June, 1974 and to the DES of March, 1975.
- B. A list of the agencies, organizations, and individuals providing written comments on the DES.
- C. A discussion of the comments and questions raised in the public input.

A. Summaries of the public responses to the alternatives brochure of June, 1974 and to the DES of March, 1975.

TABLE 1: ALTERNATIVE NUMBERS

<u>Management Action</u>	<u>Brochure</u>	<u>DES</u>	<u>FES</u>
Wilderness Study	Alt. 1	Alt. 1	Alt. 1
Roadless Recreation			
Area	Alt. 2	Alt. 2	Alt. 2
Balanced Mix	Alt. 3	Proposed Action	Proposed Action (Modified)
Mix With Timber			
Emphasis	Alt. 4	Alt. 4	Alt. 4
Maximum Timber			
Production	Alt. 5	Alt. 5	Alt. 5
No Action	Not Used	Alt. 6	Alt. 6

TABLE 2: SUMMARY OF PUBLIC OPINIONS ON THE ALTERNATIVES PRESENTED IN THE ALTERNATIVES BROCHURE

<u>Alternative</u>	<u>Strongly Approve</u>	<u>Approve</u>	<u>Disapprove</u>	<u>Strongly Disapprove</u>	<u>Modify</u>	<u>Total</u>
1	54%	7%	5%	24%	10%	100% (305)
2	21%	26%	15%	25%	13%	100% (279)
3	30%	7%	14%	49%	0%	100% (321)
4	2%	4%	11%	83%	0%	100% (280)
5	2%	1%	8%	89%	0%	100% (279)
Total						100% (1464)

TABLE 3: SUMMARY OF PUBLIC OPINIONS ON THE ALTERNATIVES PRESENTED IN THE DRAFT ENVIRONMENTAL STATEMENT

<u>Alternative</u>	<u>Respondents Supporting Alternative</u>	<u>Percent of Total Response</u>
Proposed Action (Alt. 3)	981	83%
Alternative 1	37	3%
Alternative 2	44	4%
Alternative 4	3	0%
Alternative 5	59	5%
Alternative 6	0	0%
No Preference; Other	53	5%
Total	1,177	100%

B. List of Agencies, Organizations, and Individuals providing written comments on the Draft Environmental Statement. An asterisk following a number indicates that at least one comment in the letter required a response. All such comments and responses can be found in Part C. All letters can be found in Appendix H.

Letter No.

Federal Agencies

- 1* U. S. Environmental Protection Agency
- 2* U. S. Department of the Interior
- 3* U. S. Department of Housing and Urban Development
- 4 Corps of Engineers, Department of the Army
- 5* U. S. Department of Commerce

State Agencies

- 6* Oregon State Highway Division
- 7* Department of Geology and Mineral Industries
- 8 Executive Department, Intergovernmental Relations Division
- 9* Oregon Wildlife Commission
- 10* Fish Commission

Local Agencies

- 11 City of Port Orford
- 12 Port Orford Port Commission
- 13 City of Powers
- 14 City of Coquille
- 15 Curry County Planning Department
- 16 Coos County Board of Commissioners
- 17 Curry County Board of Commissioners

Organizations

- 18* American Fisheries Society, Oregon Chapter
- 19 North West Timber Association
- 20 Powers Chamber of Commerce
- 21 Moore Mill and Lumber Company
- 22* Southern Oregon Timber Industries Association
- 23* Cabax Mills
- 24* Friends of the Earth, Inc.
- 25* Survival Center - Associated Students, University of Oregon
- 26* Industrial Forestry Association
- 27* Oregon Environmental Council
- 28* Western Forest Industries Association
- 29* Georgia Pacific Corporation
- 30 Society of American Foresters, Coos Chapter
- 31 Coquille Chamber of Commerce
- 32 North Bend Chamber of Commerce
- 33* Northwest Steelheaders Council of Trout Unlimited
- 34 Coos Head Timber Company
- 35 Coos Bay Area Chamber of Commerce

Letter No.Organization (cont.)

36 Myrtle Point Chamber of Commerce
37* C.C.D. Economic Improvement Association

Individuals

38* Harris Whitaker
39* Fred H. Swanson
40 Alan Mitchell
41* Jim Rogers
42* Jim Rogers
43 M. A. Jones
44 Patricia J. Franklin
45 Brice Wagner, et al.
46* Brice Wagner
47* William L. O'Sullivan
48 William B. Newby
49* Thomas E. Horobik
50* Gloria J. Dillingham
51* George R. Shook
52 Dena Redford
53* Dave Corkran
54* B. M. Bakke
55* Craig Smith
56 David L. Hayteas
57 Bill Gent
58* Romain Cooper
59* Reese E. Bender
60* Lyle D. Curtis
61 Lewis Krauss
62 Fred Krauss
63 Pamela De Witt
64* Joe Casprowiak
65 John and Nancy Woolley
66 James H. Sherman
67* Lorne Swearingen
68 Geneva M. Oran
69 Larry L. Bluhm
70* Daniel E. Small
71 Fern F. Haight
72 William G. Mullarkey
73 Matthew Gates
74 Anna L. Thomas
75* Wayne P. Thomas
76 Varney R. Farris
77* Vance Noble
78 Barrie Stout
79* Bill Lemoine
80 Ellen A. Warring
81* Townsend W. Dillingham
82 Edward C. Wall
83* Jerry P. Becker

Letter No.Individuals (cont.)

84* Mary F. Wiedeman
85* Paul Reimers, et al.
86 James D. Hall
87* Fred Swanson
88 Sharyn B. Alsup
89 Floyd A. Williams
90 Carl and Lois Fredrickson
91 Ronald E. Stuntgner
92 Forrest J. Hales
93 Chris Stromsness
94 Louis Prahar
95* Dee Hustead
96* Roberta B. Shook
97 Robert E. Brown
98 George A. Arvidson
99 Ralph R. Gibbs
100 Will Wirt
101* Blair A. Holman
102* William R. Poppe
103* Randall and Carol Sutton
104 Warren D. Hootman
105 George E. Knowles

106 Form Letter #1 and List of Signers
107 Form Letter #2 and List of Signers
108 Form Letter #3 and List of Signers
109 Form Letter #4 and List of Signers
110 Form Letter #5 and List of Signers
111 Form Letter #6 and List of Signers
112 Form Letter #7 and List of Signers
113 Petition #1 and List of Signers

Other Respondents

114 Port Orford Chamber of Commerce
115 Brookings Plywood Corporation
116 American Legion Auxiliary
117 Rose City Archery, Inc.
118 Menasha Corporation
119 Northwest Steelheaders Council of Trout Unlimited
120 Rogue Lumber Sales, Inc
121 Agnew Timber Products
122 Nick Reynolds
123 Dick Burkett
124 Linda L. Flaxel
125 Bob J. and Ruth Roberts
126 Westly L. Huntley
127 Al Dixonal
128 Mr. & Mrs. Charles Fitzhugh
129 Mrs. James H. Sherman

<u>Letter No.</u>	<u>Other Respondents (cont.)</u>
130	V. Dean Swanson
131	Raymond Admiral
132	Joanne Cummings
133	O. Allen Keatley
134	Larry L. Bluhm
135	Clarence L. Wyland
136	Peggy Fowler
137	Buzz Pounds
138	Darrell Woolsey
139	Mr. & Mrs. Frank Daniels
140	Larry Webb
141	Ollie Woolsey
142	Sandra Woolsey
143	Darlene Luther
144	Judy Sallee
145	Fred Green
146	Bruce Summers
147	J. W. Basker
148	Betty C. James
149	Bill Walton
150	Emily Woolsey
151	Dolores Jackson
152	Helen C. Olsen
153	Ronald Webb
154	Justina S. Morris
155	Becky Collins
156	A. W. Sweet
157	John P. Krauss
158	Donald W. Johnson
159	Rachel E. Rolfe
160	Frank W. St. Clair
161	Merle R. Kalb, Sr.
162	Mrs. Carmen E. Thomas
163	Merry L. Warner
164	Jack B. Feeney
165	John Minor
166	Steven Nicholson
167	Harold S. Potter
168	Robert G. Earle
169	Ben Pearson
170	Dick Lytle
171	Kathy Wall
172	Owen V. and Cleo Sloan
173	Douglas M. Alexander
174	Ronald A. Brandt
175	John Bushnell
176	Cameron Lynn
177	Dan Robertson
178	James L. Hanan
179	Mrs. Winnie Pickle

Letter No.Other Respondents (cont.)

180 Juanita Brown
181 Robert J. Rust
182 Barbara A. Kerr
183 Veryla C. Gibbs
184 Mr. & Mrs. Don Kooser
185 Norman R. Smith
186 Gayle Barrie Landt

V. Beck
Raymond Adams
James Cummings
O. Allen Eastley
Larry J. Bishop
Charles J. Wyland
Terry Fowler
Paula Fowles
Dorothy Woolsey
Mr. & Mrs. Frank Dunsen
Larry Webb
Ollie Woolsey
Sandra Woolsey
Darlene Luster
Judy Salice
Fred Green
Bruce Swenson
J. W. Barker
Betty C. James
Bill Walton
Emily Woolsey
Dolores Jackson
Helen C. Olson
Ronald Webb
Lillian S. Morris
Becky Collins
A. W. Seeger
John P. Kivner
Donald W. Johnson
Rachel E. Kelle
Glen V. St. Clair
Mable R. Kelle
Mrs. Carmen E. Thomas
Harry E. Warner
Jack E. Warner
John Minor
Steven Richardson
Harold R. Foster
Robert G. Earle
Ben Peterson
Dick Lucie
Randy Wall
Glen V. and Elsie Sten
Douglas M. Alexander
Donald A. Strand
John E. Smith
Cameron Lynn
Dan Robertson
James L. Hansen
Mrs. Wynne Pickle

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C. Discussion of the comments and questions raised in the public input.
(All letters referred to below can be found in Appendix H)

Letter No. 1 - U.S. Environmental Protection Agency

1. One aspect of the allocation process is not clear. On pages 40-41, timber harvest remains an option in the Fisheries/Recreation and the Fisheries/Wildlife areas where it is 'compatible with the primary objectives'. What are the primary objectives? From one standpoint, as now written, this could mean the door is open to timber harvest at some unspecified rate. Interpreted another way, it could mean only incidental, sporadic, highly restricted removal. This harvest 'option' needs more elaboration and clarification.

Response - One of the objectives for the Fisheries/Recreation Area is the protection and preservation of the basic fisheries, aesthetic, and primitive recreation resources. The second objective is the development of the primitive recreation potential in a manner consistent with the first objective.

One of the two primary objectives for the Fisheries/Wildlife Area is the protection and preservation of the existing basic watershed, fisheries, primitive recreation, and wildlife values. The second objective is the enhancement of these values where possible and when consistent with the first objective.

Both areas will be in the unregulated timber management category. This means that timber harvest will not be planned. Salvage timber harvest could occur under catastrophic conditions if consistent with the objectives listed above for each area.

2. The discussion of potential impacts appears to be rather complete for the plant, visual, and portions of the animal systems (fisheries, game animals, threatened species). The last sentence, second paragraph, page 36, indicates that an intensive wildlife survey would be useful to complete the information base for this sphere. It would appear that this would be a desirable objective or accomplishment task for the unit.

Response We believe that the information base on wildlife is sufficient to make a land use allocation decision. As always, additional information will continue to become available as time progresses. An intensive inventory over all or a portion of the Unit in the future is dependent on the future availability of funds for that purpose.

3. Alternative #6 seems like a slanted approach. No action to us means no activities on the land.

Response - We believe that no action to develop a comprehensive land use plan for the Unit would continue the existing trend of land allocation through a series of largely uncoordinated land use and functional decisions.

4. To provide a better grasp of the situation, two items would be very useful to the reviewer: (1) Show the stream classifications on a map; (2) Tie the soils information in the report text to the soils policy description in the appendix. This could be done either with a soils map or a tabulation of acreages by soil management group.

Response - We agree. These maps have been added to the text.

5. What does 'high' road standard mean? If this means two-lane superhighways, then we suggest this is a potential problem.

Response - Single lane roads with turnouts are planned within the Unit. High road construction standards refers to stringent contract standards deemed necessary to build an acceptable road to design while minimizing adverse environmental impacts.



A Well-Designed and Constructed Major Access Road
on the Siskiyou National Forest.

6. Roads are identified as a major impact causing agent. Pages 21 and 23 mention 'sophisticated road construction'. Specific prevention/ minimizing techniques are mentioned in various places e.g., ridgetop roads, limiting the amount of road (30 miles), primarily through logging systems, end haul, rolling grade, no construction, geo-technical, 'high standard'? etc. Does the aggregate of the items mentioned equal 'sophisticated'?

Response - As used in this statement, "sophisticated road construction techniques" refer to techniques requiring a considerable degree of technical knowledge, careful planning, and sometimes specialized equipment. These techniques include but aren't necessarily limited to various geotechnical studies, design of appropriate ridgetop systems, blasting operations in steep, unstable terrain, full bench construction, and end hauling operations. The purpose for using these techniques, of course, is to prevent or minimize at an acceptable level potential impacts from road construction in the Unit.

7. Pages 21 and 23 also discuss sophisticated timber harvest and logging. The same thoughts as ... above apply here.

Response - As used in this statement, "sophisticated timber harvest techniques" also refers to techniques requiring a considerable degree of technical knowledge, careful planning, and sometimes specialized equipment. These techniques include but aren't limited to harvest design, various uphill felling techniques, and various skyline and helicopter logging systems configurations. The purpose for using these techniques parallels that for sophisticated road construction techniques.

8. Discussion on page 23 and especially on pages 33-34 - infers that the amount of area cut over is important to moderate streamflow peaks..... It would appear that if the acreage treated over time is important, some upper acreage ceiling for any five or ten year period would be in order.

Response - Physical and economic realities will ensure that the actual acreage harvested each decade will strongly tend to approach the average of 1,230 acres after the first decade. A conservative rate of development in the Unit during the first decade will result in fewer than 1,230 acres being harvested during that time span.

9. It appears that the tools are available (except perhaps for appropriated funds) to control activities. What is not clear is to what degree the 'constraints' (e.g., water quality standards, SMU policy, soils) are to be overriding. Does this mean if they are violated, activities will cease? What are the kinds of actions which will be taken when constraints are exceeded?

Response - Good design will prevent many, if not most, potential problems during operations.

These operations fall under either timber sale or public works road construction contracts. Various basic and supplemental clauses within these require protection of streams and water quality. The operator can be made to provide timely remedial action should problems develop. The operation can also be shut down when unacceptable damage to other resources is imminent.

10. Another question is what are the consequences if appropriated funds for roads are not received? Proceed as best as can be done? Wait? What is the alternative?

Response - In general, forest road construction accomplished under public works projects usually result in better quality control during construction than that normally obtained under timber sale contracts. However, this trend is not universally true. Several timber sale operators in this area consistently achieve quality control surpassing that which can be expected under most public works projects. With this in mind, construction under a timber sale contract could be an alternative should appropriated funds not be available.

A second alternative would be to defer entry into areas where appropriated funds are deemed desirable but not immediately available. This approach would still allow entry in certain portions of the Unit where appropriated funds are not desired. For example, existing roads can be used as is or they can be reconstructed for use in much of the Butler Creek drainage and in the northern portion of the Unit.

At this point, the second alternative seems more desirable as it allows a longer period of time for funds to be appropriated.

11. Page 34 mentioned that Dry Creek and Elk River will be monitored. It is difficult to evaluate the effectiveness of this effort without knowing a little more about where monitoring will occur (perhaps on a map) and a brief description of the monitoring approach (long-term, short-term, year long, periodic, timed to activity level, etc.).

Response - A water level recorder and a ISCO sediment sampler have been installed in both Dry Creek and Elk River for more than a year. Each of these is located near the point where the stream leaves National Forest land. In addition, an ISCO sediment sampler was recently installed in Rock Creek. The intent is to gather several years background data prior to the commencement of development activities in the Unit. Monitoring will continue beyond that date to provide additional data and to measure impacts, if any, from development activities.

12. Quality control - what does this mean? What are some examples of quality control devices to be used?

Response - As used in this document, quality control refers to the oversight and monitoring functions necessary (Environmental Analysis Reports, inspections, etc.) to assure the necessary protection of the soil, water quality, streams, flora, and fauna. Principal responsibility lies with the District Ranger. He is provided assistance by many staff specialists.

13. With the stated critical nature of the unit, it would appear that some form of audit or evaluation would be in order before "5 to 10 years" particularly during the first 5-year period.

Response - A conservative approach to development is planned for this Unit during the first decade. This means that development will slowly proceed in increments during this time span. Monitoring and evaluation of such data will continue to provide feedback on the outcome of plans. Significant impacts, if any, thereby can be detected and methods implemented to avoid such problems in the future.

Within 5-10 years, enough new data will have been gathered and enough socio-economic and technologic changes may have occurred to warrant a thorough systematic evaluation of the entire Unit.

Letter No. 2 - U. S. Department of the Interior

1. The Geological Survey has studied two powersites that would affect portions of the planning unit along its northern and southern boundaries. The Beaver Creek site, also called the Sixes site, located outside the planning unit boundary, would utilize a 140-foot high dam to an altitude of 160 feet in sec. 10, T. 32S., R. 15 W., to store 113,000 acre-feet of water on the Sixes River. Water would be backed ten miles upstream through portions of sec. 8 and 9, T. 32 S., R. 14 W., inside the planning unit boundary. The Sixes damsite was surveyed in 1959. The Slate Creek site, located on the Elk River, would develop 500 feet of gross head with a 200-foot high dam in sec. 23, T. 33 S., R. 14 W., and a four-mile long conduit to a powerhouse in sec. 7 of the same township. Power development at the two powersites would total about 17MW, equivalent to the energy available in 158,000 barrels of oil annually.

No plans are known to be under active consideration for hydroelectric development in the planning unit area and no lands have been classified for such development. The Columbia-North Comprehensive Framework Study, Appendix XVI (1972), recommended that the Sixes and Elk Rivers be studied for preservation in their free flowing state, which could preclude power development.

Response - This information has been incorporated in the Geographical section of the Final Environmental Statement.

2. Page 1, General Summary - The Multiple Use concept of land management requires careful consideration of all the resource values involved and provision for balanced resource development. The Land Use Plan in its opening summary makes no mention at all of minerals management, and thus deviates from the Multiple Use concept.

Response - The minerals resource is described on page 25 of the Draft Environmental Statement (DES). The PROPOSED ACTION does not alter existing minerals management policies.

3. Page 9, History & Archeology, paragraph 3, 4, and 5 - The assertion that the inventories and evaluation of cultural resources mandated by Executive Order 11593 have been completed, should be more fully documented. If professionally conducted historical/archeological surveys were conducted, they should be cited. If existing survey records were consulted, this should be cited. We should point out in this regard that mere consultation with existing records is rarely adequate. In most cases, the areas involved will not have been surveyed.

Response - The 2361 section of the Forest Service Manual (FSM 2361) describes what needs to be done in Land Use Plans to meet the requirements of the National Historic Preservation Act of 1966 and Executive Order 11593. The paragraphs referred to state that we have met those requirements.

Project plans require a more complete on-the-ground archeological reconnaissance for the project area. What this means for this Planning Unit is that a qualified investigator will have to examine the area where a road is to be built or an area is to be harvested before those activities can take place. However, specific project plans can commence only upon completion of the more general land use plan.

4. Pages 12-13, Geology & Soils - The section on geology should relate geology to existing or potential mineral resources. Available information on past and present mining activities, mineral exploration, and mineralization should be obtained and documented in the bibliography.

Response - The potential for mineral resources has been added to the discussion of geology in the Geology and Soils section. Our information on potentials comes from consultation with geologists and geologic maps.

5. Page 13, Geology & Soils, paragraph 2 - The following statement is too general: "Therefore, a ridgetop road system would tend to avoid the most critical soils. This will tend to minimize accelerated soil erosion and keep existing roads in place." Although the exact location of the 34 miles of roads is not pointed out (if the entire system will be on a ridgetop system and therefore located on the 10% terrain that is moderately stable) the impacts of such construction could be serious, especially in light of the opening statement under Geology and Soils, (p. 12): "Landforms in this unit are typically steep and highly dissected. Slopes average about 80% but slopes exceeding 100% and rock bluffs are common. Slopes are convex in shape but ridgetops are typically razorback." Razorback ridgetops are normally quite narrow. Suitable waste sites for excess materials are scarce. Sidecast is likely to be a serious problem. In light of the admittedly rich aquatic resources of the Elk and Sixes rivers and unstable geology, we believe a detailed analysis of the impacts of roading is warranted.

Response - Road corridors shown on the maps have been examined on the ground but have not been staked. The latter operation and design are properly a part of project planning rather than land use planning. The DES and FES have covered the impacts and potential impacts of developing the road system in the PROPOSED ACTION. More detailed analysis of potential impacts must await specific project plans.

6. Page 15, Fisheries, paragraph 3 & 4, and Page 93B, Stream Class - The proper classification of streams is extremely important when considering subsequent timber harvest practices and their effects on fish habitat. The protection of productive streams under Classes I and II excludes upper reaches of numerous small tributaries utilized by fish for spawning or rearing. The total contribution of these smaller streams to the overall fish population could be significant and worthy of protection. Considering the soil instability of the steep terrain within the planning unit and the subsequent high risk of erosion, buffer strips of maximum possible width should be preserved along streams.

Response - The Streamside Management Unit Policy is summarized on page 15 of the DES and is shown in its entirety in Appendix B. The Class III and IV streams referred to will be protected as described in the Policy.

7. Page 25, Minerals - The draft statement merely gives passing attention to known or potential mineral resources in the planning unit... Precious locatable minerals are probably present in relatively small quantities but their quantitative presence has just not been thoroughly assessed... We believe that until a comprehensive study has been made, it is incorrect to conclude that significant deposits do not exist within the planning unit.

Response - We have not concluded that there are no significant mineral deposits within the Unit. We have stated that based on known information, substantial deposits of precious metals or other valuable minerals have not been found within the Unit - even though some of the most promising areas have been prospected.

8. Page 39 - Although hiker trails and a A.T.V. trail are shown on the map illustrating the proposed action, the text fails to discuss terrain conditions along the trail or any potential impact such as soil compaction or erosion.

Response - The terrain is typically rugged for the Unit. The potential impacts of the trail are summarized on page 46 and discussed as a part of the PROPOSED ACTION on pages 48-51 (DES).

9. Pages 40 and 41, Proposed Action - In the first paragraph, statement "A Fisheries/Recreation Area totaling 2,500 acres will be established to provide improved protection...", the word "improved" is not appropriate. How can the existing natural conditions be improved by managing the area to protect those values? The values are already at maximum. The language in the next to last sentence of the same paragraph, "... to provide near-maximum protection...", more accurately describes what will happen.

Response - The Fisheries/Recreation Area designation will result in much improved protection to the fisheries, recreation, and aesthetic resources compared to full development alternatives. In addition, we believe that under some circumstances, certain management practices can improve existing natural conditions for fishery, recreation, and aesthetic resources (e.g., the work performed in Anvil Creek to improve spawning habitat).

10. In the second paragraph on page 41, it is stated that a 5,600-acre Fisheries/Wildlife area will be established to provide "watershed, fishery, recreation, and wildlife values." The statement fails however, to address the suitability of this area for endangered and threatened species which may occur in the unit. It appears that much of the tract is located on south slopes which, as the draft says, are harsh environments. (Page 41, paragraph 1) The value of the area to the northern spotted owl and the northern bald eagle, which are listed as threatened by the Oregon Wildlife Commission, may therefore be marginal.

Response - Under the modified PROPOSED ACTION shown in this Final Environmental Statement (FES), 20% of the Fisheries/Wildlife Area must be considered prime habitat for the northern spotted owl while another 60% can be considered possibly suitable. In the opinion of the Forest Wildlife Biologist, with existing vegetation patterns in the Area, it is probable that up to 50% of the Fisheries/Wildlife Area could be utilized by the northern spotted owl.

In addition, it should be noted that all three spotted owls actually found in the Unit after limited searches were within the Fisheries/Wildlife Area.

The best habitat for the northern bald eagle in the Planning Unit is on the slopes along Elk River. All of the slopes north of the river are within the Fisheries/Wildlife Area.

11. In the fourth paragraph, it is implied that non-game species are given priority over game species. If this is what was intended, then the subject should be discussed further.

Response - Non-game and particularly threatened species will be given priority consideration in the management of the Fisheries/Wildlife Area. In general and in contrast to most game species, these species tend to benefit from minimal vegetation modification. Management in the Fisheries/Wildlife Area therefore will tend to favor these species while management in the Timber Management Area will tend to favor game species. This subject is addressed further in the Environmental Impacts section of the DES.

12. The description of the proposed plan contains no mention of management strategies following a wildfire, insect infestation, or other adverse occurrence. Frequently timber salvage operations are initiated too soon after such disasters, causing extreme environmental damage to unprotected soil.

Response - In general, we disagree with the contention. It is standard practice to initiate site rehabilitation plans before the flames are extinguished in the case of a large fire. Further, salvage logging is not necessarily sequential. Decisions are made on the basis of a careful evaluation of all values and potential impacts. In the case of this Unit, the objectives for each Area are important additional constraints. The Fisheries/Wildlife and Fisheries/Recreation Areas

will be salvage logged only if careful analysis shows that would be the best way to meet the objectives of the particular Area.

13. Page 46, 1st paragraph - If adequate sanitary facilities are provided and property maintained in sites properly located with respect to streams and other water supplies such as wells and springs, the resultant changes and increases in visitor-usage patterns may not result in serious impacts. However, the final statement should indicate what provisions and safeguards will be required and utilized.

Response - Camp sites along the trail will be primitive with little development. They will be properly located to minimize any impacts. However, heavy use of the trail is not anticipated. Should use increase at some point in the future, sanitary facilities could be added and other appropriate management activities could be initiated to minimize impacts.

14. Page 51, 1st paragraph - In essence the summary of the position taken toward mineral resources states that the proposed action will not affect the long-term capacity for mineral production because the existing level and apparent potential are low. Until a comprehensive study is made, it is incorrect to conclude that significant mineral deposits do not exist within the unit.

Response - See the remarks given in response to Comment No. 7.

15. Page 52, Section V - The potential loss of mineral availability resulting from the implication that mineral development would be halted, or at least impeded, should be recognized as an irreversible and irretrievable commitment of that resource.

Response - Any mineral prospecting or mining activities which may occur in the Unit will be subject to the 1872 Mining Laws and the same administrative mining regulations (see the Federal Register, Vol. 39, No. 168 - August 28, 1974) as other National Forest land. These regulations provide for mineral related activities under certain constraints designed to minimize environmental impacts. Detailed discussion of either the laws or the regulations is not necessary in a land use plan.

16. Pages 53-76, Alternates to Proposed Actions - Mineral resources are not mentioned in the discussion of five alternative plans. Mineral availability is important too and should be a factor considered in every alternative management plan.

Response - We agree that the mineral resource is an important resource in general.

The Responses to Comments 7 and 15 should also be reviewed.

17. Page 94, Appendix C - The monitoring of streams is not described in detail. This appendix lists Oregon Department of Environmental Quality Water standards which are to be "treated as the overriding objective of this Unit." It appears exceedingly doubtful that the proposed road construction and timber harvest could be undertaken without exceeding the turbidity standards, unless this activity would be "specifically authorized," in which case the standard would be meaningless. Also, turbidity is not the best standard for evaluating the Proposed Action; suspended sediment would be a better parameter.

Response - We believe the PROPOSED ACTION will meet all of the water quality standards listed in Appendix C. Each of the four parameters has been selected for measurement in the State by the Oregon Department of Environmental Quality.

Refer to the Response to Comment No. 11, Letter No. 1 with respect to information about the water monitoring effort.

Letter No. 3 - U. S. Department of Housing and Urban Development

1. The statement indicates that certain extensive logging activities in the past have caused excessive water run-off resulting in floods and slides. Although your proposed land use allocations should not cause high water run-offs, we would like you to know that our department is encouraging all communities to develop land use controls to minimize flood hazards. Thus, we suggest that in the implementation of your activities that they be closely coordinated with local plans to assure minimum adverse impacts.

Response - Established Forest Service policies are completely compatible with the goal of minimizing adverse impacts. Appendices A, B, and C contain, respectively, the Siskiyou Soils Management Policy, the Siskiyou Streamside Management Unit Policy, and the Planning Unit Water Quality Standards. Appendix E, Timber Purchaser Road Construction Audit (Partial), contains additional requirements pertaining to the construction of roads on side slopes exceeding 60% or in critical soils. National Forest policy requires reforestation of clear cut harvest units within five years. Additional constraints and practices for the Unit are discussed in the text. Such management of the Unit combined with the gradual roading and timber harvesting planned in the PROPOSED ACTION, will effectively prevent the Planning Unit from contributing any increased downstream damage from flooding.

Letter No. 5 - U.S. Department of Commerce

1. The draft environmental impact statement describes most of the environmental effects to anadromous fish. However, we believe that it would be appropriate to develop a natural disaster contingency plan and include it in the final statement. Such a plan would provide procedures for protection of the anadromous fish habitat after forest fires or wind storms while still allowing

timber managers to remove damaged trees.

Response - See the response to Comment 12 in Letter No. 2.

2. Page 17, paragraph 1. Due to limited catch and escapement data for Oregon coastal rivers, we suggested a 5:1 catch/escapement ratio be used for chinook salmon. On going research studies may provide updated catch/escapement data for south coastal rivers of Oregon and provide a better ratio.

Response - A 5:1 catch/escapement ratio was used for chinook salmon while a 3:1 ratio was used for coho salmon (refer to page 17, DES).

3. Page 40, paragraph 1. We recommend discussing beneficial and adverse impacts of including the entire Dry Creek Watershed in the Fisheries/Recreation area. According to the Fish Commission of Oregon the Dry Creek Watershed is one of the best natural spawning area for fall chinook along the Oregon Coast. Inclusion of the entire Dry Creek Watershed in the proposed plan would provide better protection of the watershed for water quality and thus aid anadromous fish production.

Response - We believe the PROPOSED ACTION will provide near-maximum protection of the fisheries resource. We have considered six alternatives representing a broad spectrum of potential land use plans. Alternatives 1 and 2 most closely fit the alternative you've suggested.

Letter No. 6 - Oregon State Highway Division

1. Our records show no sites in the area listed on either the National Register of Historic Places or our Statewide Inventory of Historic Places. We request that as part of the planning process a historic site survey be conducted in the area. We have not yet conducted such a survey, and several important sites may be located here.

Response - The Siskiyou currently has four persons who have received special training to qualify as archeological technicians. These people will be involved in the formulation of project plans (e.g., a timber sale or new road construction) on the forest. This will involve inventorying project areas for historic and or archeological sites. Additional expertise can be brought in for assistance when needed. Also, plans call for increasing the number of qualified technicians to at least five - or one per Ranger District.

The Planning Unit will be treated the same as the rest of the Forest with project areas being inventoried by qualified technicians during project planning.

Letter No. 7 - Department of Geology and Mineral Industries

1. Mineralization in the form of precious metal-bearing lode deposits in association with copper, lead, zinc, and possibly other sulfides may occur in the fringe area of the Pearse Peak diorite body and in the metamorphic

rocks of the Galice Formation surrounding the diorite. Re-working of the Cretaceous conglomerates by natural stream erosion would tend to release any gold trapped in these sediments and concentrate it in the present stream gravel bars.

The South Fork of Sixes River immediately north of Mount Butler has had significant placer gold production in the past and probably still represents a mineral resource potential; especially with the current high price of gold.

Placer mining activity along Elk River has been much less productive than that of Sixes River and the drainage area of Dry Creek likewise does not appear to be particularly favorable for the accumulation of gold.

Response - This information has been incorporated in the Minerals section of the FES.

2. The wording of the second paragraph under minerals on page 25 presents a rather negative, prejudiced and I think unfair attitude toward potential mining activity. Mining operations can be conducted without severe environmental damage and temporary environmental damage can be reduced by good reclamation practice.

Response - We agree that mining operations can be conducted without severe environmental damage. The paragraph has been reworded in the FES.

Letter No. 9 - Oregon Wildlife Commission

1. Whereas some species of wildlife may benefit by increased forage production from logging, two species listed as threatened in Oregon would decline in number. In addition, mass soil movement and road construction would take considerable land out of production to the detriment of forage growth.

Response - The potential impacts on wildlife have been discussed in the Environmental Impacts section (DES, page 44-45).

The net impact of road construction to the availability of palatable forage for wildlife is favorable. The existing old growth forest, hardwood stands, and dense brushfields contain very little palatable forage. New roads and harvest units will provide for markedly increased levels of palatable forage. Accelerated mass soil movement (beyond natural levels) will be minimal under existing technology.

2. Experience has shown, on the Siuslaw National Forest and similar areas, that road construction in this type of terrain leads to problems. Such operations result in soil movement, sedimentation of streams, degradation of water quality and destruction of fish habitat.

Response - First, it is important to note that the geology on the Siuslaw National Forest is completely different than that found in this Planning Unit. Therefore, direct comparisons are largely invalid.

Second, the DES repeatedly points out the rugged terrain within this Unit. It also points out that careful project planning and sophisticated existing road construction techniques will be utilized. Further, a conservative initial approach to development is embraced.

We cannot agree with the implication that regardless of the techniques available and the careful approach taken, serious environmental damages will be inevitable. The consensus of specialists in fisheries, wildlife, recreation, soils, engineering, logging systems, timber management, and other fields on the Siskiyou is reflected in the DES and FES. To summarize, the consensus is that serious environmental damages are very unlikely under the PROPOSED ACTION.

3. The Streamside Management Unit guidelines are cited as the tool to protect streams in the Planning Unit. The SMU policy is adequate protection for streams and fish habitat in many areas. It is not adequate in the Planning Unit for two reasons.

- a) Mass soil movements cannot be prevented because the guidelines only apply to the stream and adjacent habitat.
- b) Operations are allowed in Class III and IV streams that would increase the potential for sluice-outs or other failures. Allowances include: road construction in undisturbed (Class III); if it cannot be reasonably avoided, felling, skidding and road construction are permitted across stream channels providing the operations at periods of low flow and stream banks and channel disturbances are minimized (Class IV).

In an area, such as the Planning Unit, with slopes averaging 80%, with 90% of the soils being critical, unstable and with high to severe erosion potential, disturbance of stream channels and banks cannot be "minimized"; road construction in stream channels cannot leave the channel "relatively undisturbed."

Response - The Streamside Management Unit Policy is a very effective tool in protecting streams. However, it is incorrect to conclude that it is the only tool. This plan views the Unit as a system with many inter-related components requiring an assorted package of tools to manage effectively. Some of the other tools which help protect streams are: the Siskiyou Soils Management Policy (Appendix A); the Planning Unit Water Quality Standards (Appendix C); road construction practices such as full bench construction with end haul of waste material and rolled grades to keep roads as near the ridgetop as possible; timber harvest practices such as full and partial suspension of logs with skyline and helicopter systems; fuels management practices which exclude broadcast burning; a conservative approach to initial development; and a number of other techniques and policies.

It should be noted that the Siskiyou Streamside Management Unit (SMU) policy requirements exceed those of the Regional SMU policy. A review of Appendix B, the Siskiyou Streamside Management Unit policy, will reveal that even the smallest and least important streams (Class IV) are protected. Basically, streams are protected commensurate with their importance, with the most important streams (Classes I and II) receiving a very high level of protection. Less important streams (Classes III and IV) are protected to keep adverse modifications to an acceptable minimal level.

Letter No. 10 - Fish Commission

1. The fisheries values on page 18-19 and 47 may be inconclusive with respect to contribution of Elk River Hatchery. We are uncertain if the hatchery's present and potential contribution to runs and fisheries in other Curry and Coos County streams through supplemental fish stocking was fully considered in developing values in the statement. We request more information on how these values were developed.

Response - Values on the contribution of Elk River Hatchery to Oregon fisheries (page 18 and 19 of DES) were supplied to Dr. Fred Everest, Siskiyou National Forest fisheries biologist, by Mr. Ernest Jefferies, Director of Fish Culture in your agency, in a letter dated June 28, 1973. The entire text of that letter follows:

"You recently called regarding the value of the Elk River Salmon Hatchery and the fish produced. The buildings and structures are valued at \$834,219 (replacement value in March 1972). Federal funds were used as one-half the cost during initial construction. The operating budget for fiscal years 1974 and 1975 totals \$224,000. This cost is shared equally between the state and federal governments.

We recently developed some preliminary benefit/cost ratios for use in our budget hearings at the legislature. This was a cooperative effort between Dr. Jack Richards, Economist, NMFS and personnel on our staff.

Operating, administrative and research costs were considered as well as 30 year depreciation at 5 percent annual interest. There were several items not included on the value side because of lack of data. (1) The hatchery is relatively new so we do not have data on the contribution of the fish to the fisheries other than to Oregon, (2) we have made no estimate of the value of the fish released in other watersheds (1,000,000 fall chinook into Coos Bay, 100,000 into Floras Lake, etc.), and (3) we do not estimate a value for hatchery visitor days and other intangibles.

The benefit/cost ratio considering annual O&M costs and net benefits to Oregon only, is 2.04 to 1.0. For fiscal year 1973 we spent \$196,923 on operation, depreciation, etc. and we calculate the value to the Oregon fisheries to have been \$401,723.

I hope this provides the information you need.."

Estimation of fishery values for Sixes and Elk rivers were based on total escapement (including hatchery-produced adults) of anadromous salmonids entering these streams in 1973. The methods utilized for calculating the net worth of these fisheries are described by Everest (Everest, Fred H. 1973. An Economic Evaluation of Anadromous Fishery Resources of the Siskiyou National Forest. Ms, Siskiyou N.F., Grants Pass, Oregon. 21 p.).

2. The \$441,000 net annual value for fisheries attributable to the planning unit (page 47) does not seem a fair comparison to the \$750,000 gross value given for timber production. Fisheries values appear to have been underestimated based on the substantial proportion of fish production in both the Elk and Sixes systems which would be impacted within and below the planning unit.

Response - Due to differences in the nature of the resources, the extraction methods employed, and the benefits received, the net annual value for fisheries is not directly comparable with either the net or gross values for timber.

We believe that fishery values have been estimated accurately and that values downstream from the Unit have been fully considered. Please refer to the final paragraph on page 19 of the DES.

3. The high fishery values discussed in the EIS and the risk of losing these values casts doubt on the advisability of extensive road construction and timber harvest under conditions found in the planning unit.

Response - The PROPOSED ACTION in the FES provides a very high level of protection for the fisheries resource. The consensus among various specialists on the Siskiyou, including a fisheries biologist, is that the risk of serious damage to the fisheries resource as a result of implementing the PROPOSED ACTION is increased very little over the risk under existing natural conditions. (The marginal increase in risk approaches zero under the PROPOSED ACTION in the FES.)

Two other points need to be mentioned as well. First, the road system in the PROPOSED ACTION is a minimal access system, requiring a road intensity in the Timber Management Area about one half that normally developed. Second, initial development will be accomplished at a conservative rate with as much as 50% less development than under normal practice for the first decade.

4. We must by necessity judge the impacts of the proposed plan on observations of logging activities in situations similar to those in the planning unit, such as the eastern part of the Butler Creek drainage. In this case, road construction, harvest and post-harvest burning have been devastating to Butler Creek and have also caused serious losses of soil and timber production ability in the area harvested.

Response - Of more than half a dozen harvest units in Butler Creek, only one displays serious environmental impacts. This is the first large unit on the road up Butler Creek. The road was constructed and the timber harvested around 1960 when standards were much different. In addition, a hot fire burned slash in the harvest area and caused surface instability - a continuing problem. The remaining roads and harvest units in the same drainage present a more accurate picture for activities carried out during the mid and late 1960's. And the quality of management activities has improved significantly since then. One example of current road construction in virtually the same terrain is the Dixie Creek road which runs east out of Butler Creek.

5. Continuous monitoring of water quality and other environmental factors during operations under the proposed action would be helpful but could only document what happened "after the fact." Restoration of any loss to fish resources would be difficult if not impossible.

Response - Good project planning and administration prevents many potential problems from developing. Project administration and water quality monitoring allow early detection of any problems which may develop. This allows an opportunity to modify operations to avoid the problem and/or the opportunity for remedial action (e.g., removing debris from a stream channel).

6. Based on our prior experience with logging practices in southwest Oregon, the plan appears overly optimistic in being able to supervise and control ongoing activities to prevent short and long-term negative impacts to the fishery resource. Soil failures and erosion problems, in some cases even where advanced practices were applied, lead us to view road and timber operations in high hazard areas such as the planning unit with considerable apprehension. Often there has been a breakdown between planning and the results achieved after completion of an operation.

Response - The practices and policies called for in this land use plan have and are being proven in practice on the Siskiyou.

7. Recently, we observed aerially harvested sites and new end haul road construction in drainages near the planning unit. While control over erosion, site instability, and buffer zones along streams appeared dramatically improved over those from prior practices, most of these operations were scattered and only recently completed. The ability to prevent soil erosion, water turbidity, and increases in water temperature with sophisticated management techniques has not been demonstrated over a sufficient period of time under conditions found in the planning unit to assure success.

Response - We disagree. Most of the techniques and policies have been utilized on the Siskiyou National Forest for 5-10 years or more. Many have been implemented in terrain similar to that found in this Unit. Further, because review and evaluation are continuous processes, additional information becomes available each year.

8. The proposed action appears to be primarily supported by gross impact on local and regional economics from timber harvest without full consideration of the potential loss to socio-economic values derived from fishery resources if they cannot be fully protected.

Response - This is untrue. If this were the criterion, the alternative maximizing timber harvest would have been selected as the proposed action because it produces an annual cut 38% larger than the PROPOSED ACTION in the DES and 51% larger than the modified PROPOSED ACTION appearing in this FES. We believe the PROPOSED ACTION maximizes the total net public benefits, considering all factors.

9. In cooperation with your staff and the USGS, we have recently initiated collection of water quality baseline information from Elk River and Dry Creek. A delay of entry into the remaining roadless areas is necessary to establish baseline information on water quality, streamflows, and productivity of streams that can be impacted by future activities. We could cooperate in this activity to the extent of our capability.

Response - We expect to have at least 4-5 years of background data before development activities actually commence on the ground. In addition, monitoring activities will continue during development of the Unit. We hope that our cooperative efforts will continue as the Unit is developed.

10. A delay in entry would also provide your staff with more time to determine if aerially logged sites in settings similar to the planning unit can retain their initial stability and can be successfully regenerated with young trees. Regeneration techniques for sites similar to those in the planning unit would be further tested. The stability of material from new road construction will be brought into better focus.

Monitoring of buffer and leave strips in similar areas is also needed to determine if present techniques are adequate or if buffer strip criteria need modification.

Response - We believe that adequate information exists based on past experience to warrant our confidence in the proposed road-building and timber harvesting techniques. Two additional points need to be made: 1) four to five years will elapse before on-site development commences due to the necessity of completing the land use plan and the initial project planning; 2) development during the first decade will be at a conservative rate. Both favor greater data gathering and careful evaluation of results.

Letter No. 18 - American Fisheries Society, Oregon Chapter

1. There is little doubt that the best techniques will minimize road failures, but this does not mean failures will be eliminated. The fact remains that failures will occur and there is no way to prevent them from occurring on a 34 mile long road system in this fragile terrain. Even a few failures can be extremely damaging to the known fisheries resources of the area.

Response - Debris avalanches have occurred under natural, undisturbed conditions in many forested areas, including areas within the boundaries of this Planning Unit. A well-designed and properly-constructed ridgetop road system such as that called for in the PROPOSED ACTION will increase the risk of mass soil movement only slightly. Further, the probability of large, catastrophic mass soil movement occurring is very low in either case. We believe the PROPOSED ACTION in the FES will fully protect the fisheries resource in the Unit.

2. The Elk River Hatchery has a very limited capacity to cope with excess turbidity. Excess turbidities for any prolonged period of time, as could be expected from a road failure, could easily destroy part or all of the hatchery's annual production. Due to the fact that the hatchery depends upon direct river water intake, it is extremely vulnerable to turbidities of the type that can be expected should alternative Number 3 be carried out. The potential for pollution will exist as long as the roads exist. Many failures do not occur until several years after roads are built.

Response - We disagree with the assertions. First, the PROPOSED ACTION in the FES contains only 1/8 mile of road in Elk River drainage outside of Butler Creek. Second, even if a more extensive ridgetop road network were planned, the probability of the massive soil movement you refer to is extremely low, approaching zero. Third, the hatchery's annual production is under no danger under the PROPOSED ACTION.

3. The Sixes River stocks which are 70% produced by Dry Creek will be vulnerable to failures which can cause jams or sluiced out whole drainages.

Response - We disagree. Refer to the response to your first comment.

4. It must be stressed that the Elk and Sixes River stocks of fall Chinook are a unique run of fish that hold promise for the entire South Coast region. Presently, these fish are being used to re-establish a Coos River run destroyed by logging and over-fishing in the 1930's and 1940's. Nearly a million fingerlings have been released into the Coos River system each year for the past two years. This fact was not mentioned in the EIS nor was its economic worth estimated. There is no way of knowing for several more years what this may yield in dollars to the economy. The resource of Chinook eggs for such projects is very limited and should not be jeopardized in any way.

Response - Reference to the Coos River program is made in the FES. However, insufficient data exists to judge the effectiveness or value of the program at this point. (Refer to the text of Mr. Ernerst Jeffries letter found in the response to Comment No. 1 in Letter No. 10.) The source of Chinook eggs for such projects will not be jeopardized under the PROPOSED ACTION.

5. There are too many factors in the EIS that are left to the future. Road location, as well as timber units, trails, etc., is left up to the field staff. Judging from past experiences, the best judgement and techniques available will not be good enough to prevent damage to the fisheries resource in this fragile area.

Response - We disagree. Specific details regarding location of harvest units and P lines for roads are a part of project planning which is accomplished by highly competent persons of several disciplines. Each proposed project will be accompanied by an Environmental Analysis Report (EAR) which will assess the potential impacts of that project. These reports are reviewed by specialists at several levels to assure that resource management objectives are met.

6. If the USFS is to pursue a plan that will build roads and harvest timber in the Mt. Butler-Dry Creek area, it must provide a detailed layout of its proposed roads and harvest units. A one page map of a 34 mile road system is not adequate and would not appear to meet the intent or requirements of NEPA. This is an extraordinary area.

Response - We disagree. Refer to the preceeding response.

7. In closing, it must be noted that the proposed alternative number 3, if implemented, will most probably violate Region 6 Fish Habitat Management Protection Policy.

Response - We disagree. Refer to the Response to Comment No. 3, Letter No. 9.

Letter No. 22 - Southern Oregon Timber Industries Association

1. One point concerning your economic analyses disturbs us. We note very thorough consideration and evaluation of all possible impacts of fisheries use, but lack of similar treatment for timber use. We hope you will agree that if values of fish and fishing are included, it would only be equitable to include similar valuations for timber use and products obtained. Certainly, it is incomplete to tabulate stumpage value only.

Response - We can not agree with the contention that all timber use values were not considered. We have estimated gross and net values for timber, employment, county revenues, and total monetary impact (wages, salaries, profits, government expenditures, etc.). Refer to pages 46-47, 55-56, 59-60, 63-64, and 67 in the DES.

Letter No. 23 - Cabax Mills

1. We do have a few concerns... One is that a further drop in the allowable cut of timber has not been reflected adequately in its importance, either locally or nationally.

Response - We estimate that the 5.4 million board feet annual yield produced in the PROPOSED ACTION (DES) closely approximates the Unit's current relative contribution to the Forest's programmed annual harvest. This is due to the presence of some marginal and non-commercial land within the Unit (primarily included in the Fisheries/ Wildlife Area). The PROPOSED ACTION found in the FES differs from that in the DES by

having a larger Fisheries/Wildlife Area and a reduced annual yield (4.9 MMBF versus 5.4 MMBF). This has been discussed in the FES.

2. We would like to see truly intensive forest management on prime timber growing areas be explored more thoroughly as a possible alternative to show the very maximum production possible without any restrictions of visual impact, non-declining yields, recreation, etc.

Response - This will be one of the alternatives analyzed in the development of the new timber management plan. That plan is due for publication in 1976.

3. Another concern that we have is that land use planning guidelines for national goals and needs seem to be missing. It appears that the only guidelines being used to make a decision are from very local input...

Response - We disagree. The decision was based on a large number of factors, including: public laws, administrative regulations, technical and economic data, and public input. These factors take into account national, regional, and local concerns.

Letter No. 24 - Friends of the Earth, Inc.

1. We note, in addition, that timber demand is very low at the present time; therefore, the economic and social rationale which is used for the proposed management plan has dubious value.

Response - We do not agree with the contention that timber demand is low. In fact, based on the market for Siskiyou National Forest timber, demand has been strong and increasing in recent years. For example, in 1974 the average high bid for stumpage exceeded the appraised price by more than 240% - and reached an average level exceeding \$200 per MBF.

2. We do not believe that an extensive timber harvest such as the one which is planned can successfully coexist with a healthy and increasingly productive fishing industry of the type which now exists in the area.

Response - We disagree and note that a healthy fisheries resource and timber management successfully coexist on the Siskiyou National Forest and elsewhere. The PROPOSED ACTION (FES) will provide near-maximum protection for the fisheries resource.

Letter No. 25 - Survival Center - Associated Students, University of Oregon

1. Areas to be preserved as natural habitat are determined solely on the basis of low timber productivity and to offer some protection for anadromous fish. Thereby areas of unaltered environment, rare ecosystems, and habitat for threatened and endangered species would be preserved only incidentally and without regard for the actual resource involved. For example, where are existing old-growth fauna residing and what efforts will be made to preserve those ecosystems?

Response - We disagree with the contention. The Fisheries/ Recreation and Fisheries/Wildlife Areas contain most of the highest values for watershed, fisheries, wildlife, recreation, and aesthetic uses. For example, all three northern spotted owls found in the Unit to date have been located within the Fisheries/Wildlife Area. Also, it should be noted that the Fisheries/Recreation Area in particular contains some of the better timber in the Planning Unit.

2. "The area can support several uses." It appears that this assumption was simply generally applied over the whole unit. Was it assumed that logging was one of these uses the area could support? Scientific and professional testimony as well as past evidence indicates that not only is this area unsuitable for logging, but if carried out, this use would preclude the other equally important forest resources including fisheries, watershed and soil. How do you account for this testimony by experts? Is it not a violation of the Multiple-Use Sustained Yield Act of 1960, if other relative forest resources, with equally important value, are precluded by the use of just one?

Response - Timber management, including timber harvesting, is a feasible use in most areas of the Unit. Further, it can be accomplished in harmony with most other uses.

We have neither seen nor heard any scientific or professional testimony that the type of timber management called for in the PROPOSED ACTION will preclude a flow of benefits from other resources such as fisheries, watershed, and soil. As in almost all situations, there has been some disagreement among professionals as to degree of impacts. Interpreting disagreements of this nature as an either-one-or-the-other situation is incorrect. In this case, the best information we've seen supports the decision for the PROPOSED ACTION appearing in the FES.

3. "There will be an increasing need to maintain a high quality environment." (emphasis added) The proposed action does not account for this assumption. Instead, the chosen alternative calls for logging on greater and greater acreages within the unit over time, thereby decreasing the quality of the environment.

Response - We believe that the PROPOSED ACTION is responsive to this assumption.

4. "There will be an increasing demand for all types of outdoor recreation." (emphasis added) This assumption is very true, but was apparently mistakenly applied. Instead of looking at the recreation opportunities of the whole Siskiyou Forest, the state and the region, the Siskiyou planners are applying this assumption to only this planning unit and are trying to squeeze all types of recreation into it alone. How much land on the Siskiyou N.F. offers opportunities for primitive-wilderness type recreation? How many acres of classified wilderness exists in the state on forest lands, versus the remaining unprotected lands where logging will destroy the primitive recreation experience? By choosing an alternative including logging 60% of the roadless area, how are you accounting for the increasing demand for primitive-wilderness type

recreation? Lastly, by logging 60% of this area, you are precluding the opportunity for expanding the proposed trail system in the unit and are destroying the unique experience one can attain by climbing Grassy Knob and enjoying the views of the undisturbed canyons below and the ocean afar.

Response - We disagree with both contentions. The PROPOSED ACTION will increase opportunities for primitive-type recreation experiences in the Unit through the construction of foot trails in both the Fisheries/Wildlife and Fisheries/Recreation Areas. In addition, the opportunity to climb Grassy Knob and enjoy views of undisturbed canyons below and the ocean in the distance will be retained in the PROPOSED ACTION appearing in the FES.

Approximately 49% of the 61.1 million acres in Oregon is forestland. The U.S. Forest Service administers about 15.5 million acres in the state. As of 1973, all of the 837,082 acres of statutory Wilderness in Oregon were within the National Forest System. In addition, the Forest Service identified a total of more than 2.5 million acres of National Forest roadless land in more than 150 areas during the Roadless Area Review and Evaluation (RARE).

The 1.1 million acre Siskiyou National Forest contains the existing 76,000 acre Kalmiopsis Wilderness and about 280,000 acres of inventoried roadless area. 18,232 of these acres have been selected by the Chief of the Forest Service for Wilderness Study.

5. "The national demand for wood products will increase." Without forgetting about the increasing demand for wilderness type recreation and the limited land base that provides those opportunities, how significant will be an annual allowable cut of 5.4 MMBF, when Forest Service projections estimate the total national demand for roundwood to be 15.2 Billion Cubic Feet in 1980 (The Outlook for Timber in the United States, 1973)? Would it not be in the best interest of the American people to save this unique coastal roadless area for primitive recreation and manage our forests for timber on other more productive lands where a dollar invested will bring a greater wood output return than it would in this unit?

Response - The annual cut from the Unit contributes to the wood supply and to the economy on a local, regional and national basis. Regional and national supplies are simply aggregates of local supplies produced in areas like this Unit.

6. "Elk River and Dry Creek will continue to provide important habitat for anadromous fish." Again, if this assumption were actually considered, the proposed action would not include logging. Why is logging proposed, when scientific-expert testimony and past evidence suggest that these important habitats will be threatened by those activities associated with timber management?

Response - Elk River and Dry Creek will continue to provide important habitat, at essentially existing levels, for anadromous fish under the PROPOSED ACTION. For the second part of the comment, refer to the Response to Comment 2.

7. "Population levels of most unique, threatened and endangered floral and faunal species will continue to decline to the point of extinction as development progresses unless positive steps are taken to protect these species and their habitats." This assumption is true and yet is totally ignored in the Proposed Action. On page 41, the Forest Service states; Management practices will be designed to maintain or enhance carrying capacity and population levels of these species. (emphasis added) If this statement is true and if the Siskiyou forest officers were actually concerned with the fate of these valuable flora and faunal species, then why do they propose logging when they recognize that 1) on page 75 of their own EIS, the habitat of these species will sustain a "high" negative impact and 2) on page 50, that the unit carrying capacity for some of these (unique, threatened or endangered species) will be substantially reduced, and lastly on page 52, that suitable habitat for these species will gradually decline by about 40% of that at present? It is obvious that the management practices proposed will not "maintain or enhance" the carrying capacity and population levels of these species. When will you learn that the best "management practices" you can provide for these species is to leave their old growth habitat undisturbed by prohibiting logging? As public land managers, it is outright misleading to make a statement like that above, concerning management practices, and yet support an alternative that cannot fulfill the stated goals.

Response - The assumption has not been ignored. To the contrary it is central to the establishment of the Fisheries/Wildlife and Fisheries/Recreation Areas.

The statement you refer to on page 41 of the DES is referring to management of the Fisheries/Wildlife Area.

We believe the establishment of the Fisheries/Wildlife and Fisheries/Recreation Areas under the PROPOSED ACTION is a strong positive response to the above assumption and also to objective number 7 on page 38 of the DES. It will assure the maintenance or enhancement of suitable habitat for unique, threatened, or endangered species on at least 45% of the Unit (FES).

8. "The risk of wildfire ignition will increase with improved access." If retained in its roadless state, risk of man-caused fire will be minimal.

Response - We agree. However, it should also be noted that poor access increases the probability that any fire which does occur could become large and of a catastrophic nature.

9. "The scenic resource will continue to increase in importance and significance in Forest Service resource management." What consideration was given to this assumption?

Response - Most of the significant aesthetic values in the Unit are contained in either the Fisheries/Wildlife or Fisheries/Recreation Areas which will remain essentially natural in the PROPOSED ACTION (FES). This includes the seen areas from the Elk River road and from Dry Creek.

10. "Forest and regional trends indicate the desirability of maintaining, upgrading or creating trails with a significant recreation potential." Will not logging preclude your opportunities to fulfill this important assumption? How many opportunities do we have to fulfill these goals on primitive lands of significant size versus those lands already cutover? Hiking in the unit is not limited to the creek beds. One of the most desirable features of this unit is to hike up to the top of Grassy Knob.

Response - The PROPOSED ACTION (FES) calls for the creation of 26 miles of minimum-impact foot trails. The hike to the top of Grassy Knob will not be precluded.

Refer to the Response to your fourth Comment regarding opportunities for primitive-type recreational activities.

11. "The economy of the surrounding communities will continue to be heavily dependent upon the wood industry and on the National Forest for raw material."

While this may be somewhat true, it is an incomplete assumption. The economy is becoming less dependent on this resource, while becoming increasingly dependent upon the fishery and recreation resources. Based on the above assumption, the Proposed Action ignores future trends and economic goals of diversification of the economic base. The Grassy Knob and Red Cedar-Sunshine Roadless Area currently supplies economic recreational benefits to the local economy. Is it not true that they also provide significant opportunities for expanding that sector of the economy associated with fishing and hiking activities?

Response - The PROPOSED ACTION (FES) is responsive to the local economy - both as it exists and to the apparent trends. Refer to the Socio-Economic section for a description.

12. "Management activities must protect and, where practical, improve water quality for fisheries and other uses."

Insufficient consideration was given to this objective. The Proposed Action as presented, will not accomplish this goal.

Response - We disagree. The PROPOSED ACTION will protect water quality from either serious or substantial degradation. Where practical, opportunities to improve water quality above existing levels will be accomplished (e.g., planting trees along streams where a lack of vegetation permits solar heating of the stream flow).

13. "Intensive timber management activities must be designed to assure rapid regeneration and high utilization of the site."

If this area were devoted to intensive timber management, what assurance do we have that these practices, which would be necessary to protect other forest resources, will receive the necessary funds to be carried out? Even if these monies were allocated to the Forest Service in Region 6 for

intensive management, it would be spent on more productive lands in other areas, besides Mt. Butler-Grassy Knob.

Response - Forest Service and Siskiyou National Forest Policies as well as constraints listed in the FES will assure protection of other resources. Refer to the Appendix for several of the applicable policies.

"Intensive" timber management seems to mean different things to different people. In reality, it is a term representing a broad range of levels. Most of the accessible timber-producing areas on the Siskiyou National Forest currently are managed at a moderately intensive level. Additional opportunities which would further increase the level of management and the volume of wood produced are available in appropriate areas (but currently are unfunded). Timber management in the Unit would be at a level similar to that practiced elsewhere on the Siskiyou National Forest. Reforestation, of course, is a must under any level of timber management.

14. "Management activities must protect the aesthetic qualities of the area as a Whole from serious and particularly substantial long term degradation." (emphasis added) As a whole, the proposed action will not protect the area from degradation.

Response - The PROPOSED ACTION provides for little or no alteration of the primary seen areas and the areas having the highest existing aesthetic values. The 53% of the Unit in the Timber Management Area (FES) will be developed in a conservative manner and under sustained yield principles. This means that, on the average, about 0.5% of the Unit will be harvested each year. Within 10-15 years the new stand of trees ordinarily is quite large and aesthetically pleasing to many people. In this sense, access will actually increase the aesthetic resource for many people. People preferring the existing old growth and brush environment will have the 45% of the Unit in the Fisheries/Wildlife and Fisheries/Recreation Areas.

15. "Management activities must protect and will wherever possible, enhance wildlife habitat." As we demonstrated previously, seriously impacting the old growth dependent wildlife habitat, the Proposed Action is contrary to this objective.

Response - We disagree. The PROPOSED ACTION strikes a balance between improving the habitat for species preferring earlier successional stages and protecting a substantial portion of those species preferring the old-growth environment.

16. "The mix of management activities must efficiently use existing budget levels to produce a greater level of total public benefits." As we previously stated, existing budgets would be put to more profitable investments in other more productive, less marginal areas of both the Siskiyou National Forest and other national forests in Region 6.

Retaining the present undisturbed character of the unit would bring the greatest total public benefits.

Response - We believe the PROPOSED ACTION will maximize the total net public benefits, efficiently using existing budget levels to produce a wide variety of benefits including quality water, fish, timber, recreational opportunities, etc.

17. First of all, scientists in the Forest Service, at universities, and other institutions simply do not have sufficient understanding of the pertinent environmental problems to say whether or not the Proposed Action will have adverse impacts on the fisheries resource. The only solid evidence of the ability of the Forest Service to manage land similar to the roadless areas is based on past performance. Where the Forest Service has managed lands with soils and slopes identical to conditions in the roadless area they have done an unacceptable job.

Response - We disagree with both contentions. A substantial amount of information is available and continues to accumulate. Evidence of acceptable management can be found on the Dixie Creek road in the same terrain east of and adjacent to the Unit. Evidence can also be found in harvest units within the Planning Unit itself in the Butler Creek drainage. Other similar areas can be found on the Forest.

18. In the analysis of environmental impacts of the Proposed Action, no evaluation is made of the loss of natural ecosystem. The research, aesthetic and recreational value of these resources will increase dramatically in the next several decades as the intensive timber management eradicates undisturbed sites in all surrounding areas.

Response - This is discussed in Sections III and V of the FLS.

19. On page 41, you state: "Sound forest management in this Unit requires the use of appropriated funds for construction of main access roads." What if these funds are not available?

Response - Refer to the Response to Comment No. 10 in Letter No. 1.

20. Because of the need to minimize impact on the critical soils which occur throughout much of the Planning Unit, logging by helicopter methods is proposed for 29% of the volume to be extracted under the Proposed Action. However, we feel that it is unrealistic to expect that this amount of helicopter logging will be done in the area. The method is still in an experimental stage and it is proving to be very expensive both in terms of total cost (\$/MBF) and energy consumption (gal./MBF).

Response - Helicopter-yarding has proven itself to be a reliable and feasible system on the Siskiyou National Forest and elsewhere in Forest Service Region 6. To date, the Siskiyou has sold 74 million board feet (MMBF) of timber requiring helicopter-yarding. The figure for Region 6 exceeds 450 MMBF. Large additional volumes are known to have been sold in other regions. Most of these volumes have already been removed by helicopter, helicopter sales currently are selling well, and prices being bid on this forest are considerably higher than the appraised prices. As for cost of the system, dollars per MMBF cost varies depending

on land characteristics, stand characteristics, and other factors. In at least one recent sale on the Siskiyou, skyline logging was appraised at a higher cost than a helicopter operation on the same area.

21. Public and agency input to the planning process was virtually ignored.

Response - We disagree. In fact, public and agency input has been an important factor throughout the planning process, including during the formulation of alternatives and during the decision process for selection of the PROPOSED ACTION. Frequent contact and cooperation between the Forest Service and the Fish Commission (now the Department of Fish and Wildlife) resulted in the modified PROPOSED ACTION appearing in the FES.

One point regarding public input in general needs to be made again. That is, public input must not be thought of as an election where the alternative receiving the largest vote total is selected. One of the several reasons for this is that where the number of response forms is limited or where the communication system is less than perfect, the response received tends to bear a direct relationship to who received the forms. Thus if Interest Group A received 75% of the forms while Interest Group B received the remaining 25%, the response received is likely to reflect that ratio.

However, public input does provide useful information to decision-makers. For example: 1) it identifies the concerned segments of the aggregate public for the given issue; 2) it identifies the particular concerns and values of each of these "publics" and may reveal the rationale behind each public's preferences; 3) it may provide additional information about the issue; and 4) it may suggest viable new alternatives which should be considered.

Letter No. 26 - Industrial Forestry Association

1. The primary problem with developing these "net economic benefits" per fishing day and then multiplying to determine annual benefits is that there is established a comparison of these values with timber "net" values on page 28. Admittedly, you do not specifically state that the two "net values" should be compared. But, by not saying that they should not, and in fact cannot, be compared, the comparison is and will be made. Stumpage value (net timber value) and net economic fish value are not in the same economic ball game.

Response - We agree. Due to differences in the nature of the resources, the extraction methods employed, and the benefits received, the net annual value for fisheries is not directly comparable with either the net or gross values for timber. Footnotes to this effect have been added to the text in the FES.

2. Most important, however, is our contention that fisheries are important and are provided much protection by present Forest Service management practices. One gets the feeling from reading the fisheries section that the total fishery will be wiped out. Again, we must agree with Mathews when he points out that "it is not likely that the salmon fishery... will suddenly be eliminated entirely." With sound forest management and adherence to Streamside Management guidelines, there is no reason the fisheries in the long pull will not be improved or at a minimum maintained. This result can be independent of the proposed annual cut so that we should not be telling the people that it is an either/or situation.

Response - It would be incorrect for any reader to interpret all or any part of either the DES or FES as presenting an either/or situation with respect to timber and fish. We have attempted to project potential impacts. However, we estimate that under even the most unfavorable alternative to the fisheries resource, more than half of the existing fisheries resource would remain. By contrast, the PROPOSED ACTION (FES) is expected to maintain the fisheries resource at population levels closely approaching 100% of present levels.

Letter No. 27 - Oregon Environmental Council

1. The EIS states (page 50) that "destruction of the scenic qualities along either Dry Creek or Elk River will not occur." We seriously doubt this contention and believe instead that there is a great danger that the buffer strip in Dry Creek will blow down, possibly connecting clearcuts on opposite sides of the creek.

Response - The possibility of substantial blow down exists whether timber stands are harvested or left in their natural state (witness the extensive blow down in virgin areas during the 1962 Columbus Day storm). We believe the possibility of extensive blow down in the Unit under the PROPOSED ACTION is not much greater than the "natural" rate. Likewise, timber stands in the Fisheries/ Recreation Area should remain intact under proposed dispersion of harvest units (in the Timber Management Area) in both time and space.

2. It is quite conceivable that over a period of years, as more logging occurs in the Dry Creek Unit, there will be only isolated patches of the buffer strip remaining. Section G, Fisheries, implies that the removal of a significant portion of the timber shading Dry Creek would cause the water temperature to rise beyond a point tolerable to salmonids, thereby reducing the Sixes River Salmon run by 65%.

Response - Refer to the Response to Comment No. 1 above. The conclusion that a 65% reduction in the Sixes River fisheries resource will occur is incorrect even if the highly unlikely possibility you present should occur. Virtually all of the salmonids spawned in Dry Creek rear in the Sixes River during the summer months when water temperature can become critical. The volume of water Dry Creek contributes to the Sixes

River does not materially alter the temperature of that river.

3. The report fails to state how a situation causing unacceptable degradation of the water quality might be corrected.

Response - Refer to the Response to Comment No. 9 in Letter No. 1.

4. The fact that siltation can destroy the spawning beds, coupled with the fact that nearly all of the soils in the unit are classified as "critical" would seem to indicate that tampering at all with the soil is very likely to result in a reduction in the spawning capacity of the streams in the Unit.

Response - We disagree. Refer to the Response to Comment No. 2 in Letter No. 26.

5. Contrary to the statement in the EIS (p. 50) that "The proposed action will provide a sustained, non-declining yield of timber," we fear that removal of the timber on such steep, shallow, unstable soils, exposing them to the full force of sunlight, wind and rain may in many cases make regeneration virtually impossible. Moreover, nutrient losses due to erosion and leaching when the barriers (debris) have been removed could cause irreparable loss of productive capacity over a term of many centuries.

Response - We do not agree. We believe both these topics have been adequately discussed in both the DES and FES. (Refer to pages 32 and 43, DES, for example).

6. The Forest Service proposes to construct the road system with appropriated funds, at a cost of approximately \$1.8 million. If they mean to construct the entire 30 mile road system for this amount, this calculates to \$60,000 per mile, a ridiculously low figure for this area. A 16 foot, full bench road on steep ground, requiring end-haul of all excavated material, costs about \$200,000 per mile or \$6 million total. How do they propose to acquire these funds? To our knowledge their efforts to obtain financing for construction of access roads in this area (Powers and Gold Beach Districts) have been largely unsuccessful, with the one exception of the Grassy Knob Road, a two lane blacktopped road intended for removal of the timber in the Mt. Butler-Dry Creek - Grassy Knob Area.

Response - It would be desirable to finance about 38% of the new road construction - or about 13 miles - with \$2.9 million (FES) of Congressionally appropriated funds. This would build the main access road. Tributary access roads account for the remaining 62% of the mileage and would be constructed under timber sale contracts over a 30 year period.

7. If appropriated funds are unavailable, what is the alternative --forget the whole thing, or sell enough timber initially to construct roads?

Response - Refer to the Response to Comment No. 10 in Letter No. 1.

8. On the Powers and Gold Beach Districts helicopter logging has been confined to areas having a high volume of Port Orford cedar; these sites are generally characterized by richer, hence more stable soils.

Response - Helicopter sales on these two Districts have had nearly twice the volume of Port Orford cedar compared to the volume on the average sale (approximately 16% versus 9%). However, the higher cedar volume has not been the factor which made the sales economically feasible as you imply. (Two recent helicopter sales on the Siskiyou contain little or no Port Orford cedar). The higher percentage of cedar results because the species grows best in the bottom of drainages where moisture is more abundant and soils are more unstable. The instability of soils is often the main reason for requiring helicopter-yarding.

It is incorrect to assume that the more fertile soils are stable soils. In fact, there is a strong tendency for deeper and more fertile soils to be unstable soils.

9. Furthermore, there is no assurance that roads will not be built into helicopter sales, even though they have determined that a road would not be permissible into that particular sale. A case in point is the Wilhite Helicopter sale sold on the Gold Beach District about two years ago. The Forest Service insisted that roads could not be built into the sale, and further insisted that only owners of Sikorsky S-64 helicopters could bid on the sale. The Forest Service then permitted the helicopter owner to build a two mile road right into the center of the sale. Will the Forest Service allow construction of additional roads into helicopter sales if the helicopter owners convince them they are necessary? Additionally, helicopter yarding is so costly that its use nearly amounts to government subsidization of the timber removal.

Response - The Wilhite sale had some unusual circumstances related to it which caused it to be an exception to normal procedures. The final road location and helicopter landing would have been planned for the Wilhite sale (and was planned for the future North Brushy sale) except for the fact that it would have had to cross through part of an unfinished harvest unit in the Brushy Devil sale. A secondary location was then planned. Meanwhile, the Brushy Devil sale unit was completed after the Wilhite sale was sold but prior to the commencement of logging operations on Wilhite. Under the purchaser's option in this contract, the purchaser elected to build the road along the flag line for the road accessing the proposed North Brushy sale.

Two points are important to remember about the Wilhite sale: 1) 100% of the volume on the sale was helicopter-yarded; and 2) while the road entered the general sale area, it did not provide direct access to any of the five harvest units and yarding by any system other than a helicopter would not have been possible.

The facts (stumpage prices paid for the various helicopter sales) reject the contention that timber removal is subsidized by the government in helicopter sales. For examples: 1) Wilhite sold for approximately \$20/MBF, 2) the 5 million board feet (MMBF) Dutcher Creek helicopter sale, containing only Douglas-fir and Sugar Pine, recently sold for more than \$71/MBF; and 3) the Dutcher Creek sale was appraised cheaper as a helicopter-sale than as a skyline sale.

10. Although skyline yarding is less costly, we doubt that this system will be feasible in much of the Dry Creek drainage, due to lack of adequate tailholds. Stumps are not well enough anchored in the rock mulch. Also, the wide buffer strip along Dry Creek will preclude tailholding across the creek which will be necessary for adequate lift.

Response - Logging systems feasibility was carefully evaluated throughout the Unit during formation of land use alternatives. This included evaluating tailhold opportunities clearances, payloads, and in the case of the PROPOSED ACTION, the effect of the Fisheries/Recreation Area.

11. We would, however, question one statement made in the Fisheries section. On page 19 the assumption is made that, since 22% of the Elk River watershed originates in the planning unit, one must conclude, lacking further evidence, that 22% of the fisheries value will also originate in the Unit. However, our expert in the area informs us that salmon do not spawn more than two or three miles above Butler Creek, and a significant portion of the Elk River watershed originates above there. Nor do many fish spawn in Panther Creek, and only a moderate number in Butler Creek. Therefore, the percentage of fish born in the Unit's streams is likely to be far higher than the proportion of water that Unit contributes to the Elk.

Response - Many factors, including spawning area and rearing area, can limit salmonid populations in streams. In streams of southwest Oregon gravel resources generally exceed the requirements of salmonid populations, while rearing area for juveniles most frequently regulates population size. The population of wild chinook in Elk River has remained nearly constant despite an intensive hatchery enhancement program and increasing numbers of hatchery adults spawning with wild stocks. While nearly 40% of the chinook spawning naturally in Elk River utilize streams draining the Planning Unit, it does not logically follow that 40% of the value of the total chinook run in the Elk can be attributed to the Unit. The stability of the run, despite an increase in the number of spawners, supports the contention that rearing area is limiting fall chinook in Elk River, not spawning area. Data collected at Elk River Hatchery will continue to clarify these relationships, but until additional data indicate otherwise, we believe that 22% fairly appraises the Unit's contribution to the total value of the fishery resources of Elk River.

12. The report states that the Unit receives 85-90 inches of precipitation annually, whereas the average annual precipitation measured over the past four years, at the Elk River Hatchery (Port Orford Station 5 East) is 135 inches. Thus the accuracy of figures relating to watershed is doubtful.

Response - The precipitation estimate was based on isohyetal graphs based on long term (27 years) Weather Service precipitation records.

The Fish Hatchery began gathering precipitation data in 1972. In comparing this information with that gathered in Port Orford since 1972, one finds that the Fish Hatchery information averages 172% of that recorded at Port Orford (137 inches versus 80 inches). There could be a number of reasons for the difference between the long-term trend of 85-90 inches of precipitation in the Unit and the 137 inch three year average at the Hatchery. First, based on recordings at Port Orford the three year average (1972-1974) was nearly 10% above the long-term average. Second, and more importantly, meteorologists agree that the Hatchery quite likely is located in a localized wet spot (located at the east end of the Elk River flood plain and at the base of steeply-rising slopes, orographic lift may be the reason for this phenomenon).

We believe the 85-90 inch average is a good estimate for the entire Unit. Variations will occur within the Unit. However, the exact average precipitation in parts or all of the Unit is a relatively unimportant variable to land allocation decisions in this area of heavy precipitation.

13. Ranchers along the Elk and Sixes Rivers draw considerable water for summer irrigation. A reduction in flow will cause acute problems between the fisheries resource and cattle and sheep raising. No mention is made of this fact, nor is any consideration given to possible increased demands for water. Furthermore, higher water levels in winter, due to increased runoff caused by timber removal will no doubt cause increased bank erosion along farm lands. No mention is made of this loss, even though it is of increasing concern to ranchers.

Response - Significant fluctuations in the runoff rate pattern and resultant changes in streamflow pattern will not occur under the PROPOSED ACTION.

14. No presentation is made of the data used to determine the total volume of the timber in the Unit, nor is any explanation given of how the allowable cut was determined, yet timber types are listed with volumes to the nearest one thousand board feet.

Response - Timber volume estimates were developed from the study of timber type maps and on-the-ground conditions. Random traverses throughout the Unit were made to verify typing and to obtain additional timber data. Average volumes by type were based on this information, actual cut-out volumes in similar types which have been harvested, and volume estimates in similar areas. The estimates appearing are the best estimates available for each type in the Unit. The annual yield calculation was based on even flow assumptions and included consideration of liquidation of designated old growth timber, intermediate growth, and growth in the first full managed rotation.

15. The possibilities for reforestation are quite limited... We would urge the Forest Service to wait until they have figured out how to reforest the first clearcut unit on the Butler Creek Road before embarking on experiments in Dry Creek.

Response - We disagree with the contention that reforestation probabilities are very low throughout the Unit. The DES points out that reforestation problems could develop in certain areas - particularly if ground skidding and broadcast burning were widely used. The DES and FES specifically call for excluding both of these activities in almost all cases. Under these constraints, reforestation is unlikely to be difficult on most of the Unit. This is supported by past results in Butler Creek in the eastern end of the Unit. All but one of the more than half a dozen harvest units are satisfactorily stocked or overstocked. The exception was the only unit burned.



Vigorous Saplings in Butler Creek Harvest Unit

16. Data given on timber values indicate a annual cut of 5.4 MM board feet having a gross value of \$1,188,000 or \$220/M. This sounds reasonable. The net value of the stumpage (presumably deducting harvesting cost) is \$328,000 or \$60/M leaving \$160/M for harvesting. We assume this includes road construction costs, as it should. Skyline logging costs on the average about \$80/M and helicopter logging about \$120/M. Using the Forest Service estimate of about 71% skyline and 29% copter logging, this figures out at \$92 for logging, leaving \$68/M for roads. At \$6 million (our estimate) for construction of 30 miles of road, it should take 88 million board feet to pay for the road, or at 5.4 MM per year, 16 years. At that point, the taxpayer (who paid for the road) will begin realizing a return on the investment. Or, if the roads are not built on access money, how much timber will be harvested annually to build enough road to reach it. This possibility is not considered in the EIS.

However, presumably the road would not be constructed at once, but might span a period of 30 years. If ten miles were constructed the first year, and logging was conducted at a rate of 5.4 MM per year, a profit would be realized by the sixth year, and a total profit of \$1,672,000 would be made in ten years (54 MM x \$68/M = \$3,672,000 - \$2,000,000 road construction cost) or \$167,000 per year. The county receives as its share 25% of this, or \$42,000 per year, a paltry sum for a county receiving an annual \$2.2 million in Federal timber receipts (page 9). The EIS calculates about twice the annual receipts than we do, due to the ridiculously low road construction estimates in the report.

Response - The gross value listed for timber is the sell value. The net or stumpage value used in the FES was arrived at by subtracting logging, road building, hauling, processing, and several other costs from the sell value. Refer to the Response to Comment No. 6 in your letter with respect to road construction costs. The FES projects County revenues at \$41,000 per year for the first 30 years and at \$59,000 after 30 years under the PROPOSED ACTION.

17. All of this assumes that the planned 30 miles of road will be adequate. This appears doubtful, as the little map showing proposed road locations indicates timber harvest over distances in excess of one mile from the nearest road. A Skagit BU-99 yarder is capable of yarding 1/2 mile, and a Sikorsky S-64 copter, although it has the physical capacity to yard over any distance, apparently cannot economically fly much further than 1/2 mile. Daily volume is extremely critical in helicopter yarding. A copter flying level or downhill over a 1/2 mile span can move 200 MM board feet per day for about \$100 per M. However, if he has to exceed that distance or fly uphill and reduces his daily volume to 100 MM, his yarding cost is \$200/M equaling the value of the timber. The conclusion then is that the timber values barely seem to equal the costs of removal, and in all probability the costs of removal will far exceed the Forest Services's estimate.

Response - The estimates of the physical and economic yarding capabilities of the two machines are underestimated by roughly 100%. The estimate of yarding costs for flying logs uphill over 1/2 mile are overestimated by more than 250% under normal circumstances. Uphill yarding does not materially alter yarding costs for the S-64.

18. The statement admits that the suitable habitat for endangered species, notably the spotted owl, will be greatly reduced. It does not point out, however, that in a few decades there will be no habitat for this species or many other species requiring stands of old growth timber anywhere in the region except for a few areas set aside from logging. The intangible value of preserving the spotted owl is given virtually no consideration in comparison to the dollar value of the timber. Furthermore, the bird's habitat is not clearly defined at all. They may be found only in Dry Creek, as this species lives only in undisturbed canyons and Elk River no longer meets this criteria.

No mention is made of any effort to protect the species presumably because, unlike anadromous fish, it has no dollar value.

Response - All three northern spotted owls found in the Unit to date were located in the Fisheries/Wildlife Area along Elk River. Refer to the response to Comment No. 10, Letter No. 2 relating to habitat.

The statement that the spotted owl was given virtually no consideration is unsupportable. Concern for the species is reflected in the fact that the species will be given priority consideration in the management of the 7,400 acre Fisheries/Wildlife Area (see paragraph 4, page 41, DES).

19. The Unit is described as having a low rating for the Roadless Area Review and Evaluation (RARE), but no reason is given for this, nor is any explanation of the rating system given. It would be interesting to know more about this process. Who makes the evaluations? What are the criteria? How many points did other areas receive?

Response - Paragraph 1, page 35, DES states that the wilderness quality index was developed during the Roadless Area Review and Evaluation process. It also states that the roadless area in this Unit received only 57 of 200 possible points and in doing so ranked in the lower 20% nationally. The rating was also second lowest of the 12 roadless areas on the Siskiyou National Forest. For an explanation of the rating system refer to the Final Environmental Statement on Roadless and Undeveloped Areas (Selection of Final New Study Areas from Roadless and Undeveloped Areas within the National Forests. 1973, U.S.D.A. Forest Service. Washington, D.C.)

20. Through erroneous statistical manipulation, the conclusion is drawn that adoption of Alternative 1 would cause the loss of between 38 and 73 jobs in western Oregon. This is ridiculous. Employment is primarily dependent upon market conditions rather than timber volume. True, it takes a minimum volume of timber to keep a mill operating, but the loss of 3.4 million board feet divided by the total volume used by the companies that bid on timber in this area would have virtually no effect on the number employed by these mills. If a mill had reduced its inventory of timber under contract to 3.4 million board feet, it would be out of business anyway.

Response - Employment is dependent upon both market conditions and availability of raw materials. A reduced level of raw materials to be processed will result in the need for less manpower in the processing industries. The estimates are reasonable and realistic.

Letter No. 28 - Western Forest Industries Association

1. This draft concludes that intensive forestry is probably destructive to anadromous fish. There is no factual evidence to indicate this. The comparative data for the proposed action, pages 73-76 of your draft, is based on conclusionary statements which are not verified by studies and factual data.

Response - We do not believe that intensive forestry is necessarily destructive to anadromous fishery resources. There are many outstanding examples where the productivity of both the timber and fisheries resources are maintained at high levels within the same spatial and temporal distribution. However, under certain circumstances the relationship can be less compatible unless additional measures are implemented (such as the land allocations and management techniques called for in the PROPOSED ACTION.)

2. In discussing adverse impacts on page 48 and 49, socio-economic impacts are ignored.

Response - We disagree (refer to paragraph 7, page 48, DES). We believe that the Unit under the PROPOSED ACTION will continue to contribute nearly the same amount to the Forest's programmed annual harvest calculation as it has in recent years. Thus, the impacts you refer to are virtually non-existent.

3. Finally, we find it astonishing that the Forest Service believes itself to be incompetent to administer intensive forestry in conjunction with anadromous fish waters. We had thought that the goal of managing a forest for the perpetual production of the wood needed by the American people could be accomplished simultaneously with the protection and, indeed, the expansion of the fish resource. Both timber and fish are important. Competent management could serve them both.

Response - We believe that "good" forest resource management on public lands seeks to maximize the total net public benefits (benefits measured in both quantitative and qualitative terms). In order to attain such an optimum, it is often impossible for anyone to maximize production from any one resource on all acres under consideration.

Letter No. 29 - Georgia-Pacific Corporation

1. We would request the U. S. Forest Service to periodically review this Proposed Action, if accepted. If it was found at a later date that more timber could be harvested without the loss of the other resource values,

then this should be done. It makes little sense to us to determine a strict allowable cut now, when, in the future, more timber production might well be feasible and desirable.

Response - Planning assumption number 12 (page 37, DES) addresses the need for periodic re-evaluation of long range plans.

The annual yield estimate for the Unit is only an estimate of the Unit's productivity based on current technology and utilization. The Forest's programmed annual harvest is recalculated periodically based on data from the entire forest. Land use allocations on this Unit contribute to the information base from which that calculation is made.

Letter No. 33 - Northwest Steelheaders Council of Trout Unlimited

1. Dry Creek is one of the last remaining tributaries of the Sixes River that still produces a large number of Salmon, Trout, and Steelhead. It is a very important tributary which should be left in its natural state. If logging has to be done why not use Helicopters and do selective logging?

Response - Approximately 25% of the volume to be harvested under the PROPOSED ACTION (FES) will be helicopter-yarded. The percentage in Dry Creek is even higher. The appropriate type of harvest unit (clearcut, shelterwood, etc.) depends on a number of on-the-ground variables and is therefore largely site-dependent. However, it should be noted that based on field studies in the Unit, it appears that strip and small patch clearcuts appear to be most appropriate on much of the area.

Letter No. 37 - C.C.D. Economic Improvement Association

1. The Experiment Station has recently indicated in a publication, Two Projections of Timber Supply in the Pacific Coast States, that the severity of the economic dislocation can be mitigated through the undertaking of "intensive management" practices. This possibility respective to the Planning Unit and the South Coast economy was not discussed in the Draft Statement, even though it was indicated that, under the Proposed Action, lands designated for commercial purposes would be managed with "intensive timber management activities."

Response - Refer to the Response to Comment No. 13, Letter No. 25 for the explanation of "intensive timber management" as used in this document.

The higher level of intensive timber management (relative to the existing level) referred to is appropriately addressed in the new Siskiyou Timber Management Plan. This Plan is scheduled to appear in a Draft Environmental Statement next summer (1976). A variety of practices and levels of management intensity along with the various potential impacts will be addressed.

2. What specific activities (e.g., precommercial thinning, commercial thinning, conversion of hardwood stands to conifers, use of genetically superior seedlings, etc.) are being anticipated by SNF as elements of its "intensive timber management activities? At what level is it anticipated that these activities will be undertaken?

Response - The moderately intensive level of timber management currently being practiced on "managed stands" usually includes these practices: planting, release, precommercial thinning, and commercial thinning.

3. What will be their impact upon fiber and saw-timber production within the Planning Unit?

What is the maximum biological potential yield from the acreages designated for commercial timber production within each of the considered alternatives?

What will be the probable cost of these activities?

Response - Refer to the Response to Comment No. 1 above.

4. Will these activities include reasonably rapid conversion of poorly stocked conifer acreage (5,186 acres) and hardwood-stocked acreage (2,984 acres), which together represent 37% of the Planning Unit, to well-stocked stands of Douglas-fir?

Response - The calculation of the annual yield for the Unit reflects the conversion of red alder hardwood stands (in general, the best sites currently growing hardwoods) to conifer production (roughly 6% of the hardwood acreage). Stands of tanoak and other hardwoods were not included in that calculation but could contribute additional volume if converted in the future. Poorly-stocked conifer stands will be converted to well-stocked conifer stands following their harvest. This generally reflects the thrust of current practices elsewhere on the Forest.

5. If these activities result in greater Douglas-fir fiber and saw-timber production within the Planning Unit, what effects will this increased growth level have upon the "annual cut" (as defined in the Draft-Statement)? (This question is based, in part, upon the allowable cut effects discussed in the PNWFRES publication listed above and the report, PNW-26: Sensitivity of Allowable Cuts to Intensive Management)

What opportunities exist for SNF, under the Proposed Action, to increase the annual cut within the Planning Unit based upon the considerations outlined above? What will be the likely environmental impacts of the potential increased harvest rate? What will be the comparative anticipated costs of an accelerated harvest program vs. the Proposed Action in the Draft Statement?

- A. An accelerated timber harvest schedule due to recognition of increased growth because of intensive management practices.
- B. An increased annual allowable harvest due to recognition of technological trends toward utilization of smaller logs.

- C. An accelerated schedule during the next 1-3 decades for harvesting merchantable timber within the Planning Unit to compensate for rapidly declining timber availability from private commercial forest land.

Response - These questions are appropriate for the Timber Management Plan as explained in the Response to Comment No. 1 above.

6. Upon what basis was the estimated annual cut for the Proposed Action within the Planning Unit determined? Did this determination of an apparent growth cycle of approximately 75 years (non-declining annual yield of 5.4MMBF from a present resource of 400 MMBF) include the following considerations:
- A. The allowable cut effects of the planned intensive timber management activities?
 - B. Technological advancements which have increased industry's ability and desire to utilize smaller logs?

Response - Factors relevant to the calculation include: a) 100 year rotation; b) non-declining yield; c) liquidation of existing stands within the Timber Management Area over the rotation; d) growth during the liquidation phase; e) an estimate of growth during the first fully managed rotation based on site productivity and existing levels of timber management and utilization.

Letter No. 38 - Harris Whitaker

1. Nothing is said about ORV's, which have caused untold damage, some of it relatively permanent, to many a sylvan spot.

Response - In general, ORV's are unsuited to the conditions found within the Planning Unit. A comprehensive Forest plan is being formulated. This plan will delineate specific areas where ORV's may or may not be operated, or may be operated under certain conditions.

Letter No. 39 - Fred H. Swanson

1. The EIS does not convince me that 5.4 million board feet can be taken from this unit in perpetuity. Using your figure of 400 million board feet of accessible standing timber, gives an average rotation age of about 75 years.

Response - The rotation length is 100 years. Refer to the Response to Comment No. 6, Letter No. 37.

2. You use a curious logic to justify appropriating money to build the initial logging roads in the unit. Timber receipts would pay for the roads in the long run, assuming that cutting went ahead as planned. What if the resource damage proved to be greater than anticipated? The already-built road system would be a strong inducement to continue cutting and recover the return on the investment.

Response - The PROPOSED ACTION (FES) calls for a road system of approximately 40 miles (31 miles of which will be new construction). Only 13 miles of this is proposed for public works construction. This main access road would likely be constructed in two or three segments. The remainder of the road system would be constructed through the timber sale contract over a 30 year period. Combined with a conservative initial rate of development, these plans maintain a great deal of flexibility to deal with any possible unforeseen situations.

3. Your soils inventory shows that 90% of the unit has critically unstable soils. The terrific landslides in section 36 show the results of careless entry on these soils. Throughout the EIS are warnings on the difficulty of logging this country. Given the nature of fragile rock-mulch soils, a conservative approach is best. Why then is the proposed action so grossly timber oriented? I have not seen any examples on the Siskiyou of the kind of careful forestry you claim would be practiced on this unit. You propose, in effect, to undertake a gigantic uncontrolled experiment.

Response - The contention that the PROPOSED ACTION is grossly timber-oriented is not supported by the facts. For example, 45% of the Unit has been allocated to classifications that will essentially maintain existing environments. The second contention that the PROPOSED ACTION is an uncontrolled experiment suffers from a review of the actual situation. The PROPOSED ACTION is based on a great deal of information including results already obtained on-the-ground in the Unit and in similar terrain elsewhere. As pointed out in both the DES and FES, development during the first decade under the PROPOSED ACTION will be at a conservative rate.

4. The EIS states that logging individual Class III and IV stream drainages would not increase downstream water temperatures. Does this same assertion hold if many such streams are cut over? The critical situation with the Elk River Hatchery's water supply dictates a conservative approach that should be applied to the Dry Creek drainage as well.

Response - The answer to the first question is yes under Forest Service harvesting practices which provide streamside protection and which provide dispersion of harvest areas both in time and in space. The second part comparing the water temperature situations in Elk River (due to Fish Hatchery use of the water) with Dry Creek is not applicable. As explained in the Response to Comment No. 2, Letter 27, water temperature is not the critical variable in Dry Creek as it sometimes is in Elk River.

5. National Forests do not exist to serve a local economy; they must serve a national interest. It is evident that the Siskiyou intends to dedicate the Mt. Butler-Dry Creek unit to the service of Curry County. Establishing a Grassy Knob wilderness study area is the only way I see to insure a proper national perspective in the planning of this area.

Response - We believe the planning process and the PROPOSED ACTION are responsive to a balanced mix of national, regional, and local goals and needs.

Letter No. 41 - Jim Rogers

1. After reading the EIS, it is apparent that local economic interests have a much greater effect on the Forest Service than I had ever believed.

Response - Refer to the Response to Comment No. 5, Letter No. 39.

2. The potential for damage to all resources (including the future timber resource) must be considered very high.

Response - The potential for damage is high unless adequate measures are taken. The DES and FES list some of the measures which have proven to be effective in similar situations on the Siskiyou National Forest.

3. It is quite likely that reforestation will prove virtually impossible in much of the Unit.

Response - We disagree. Reforestation will require careful pre-planning to avoid problems. There will be isolated areas within the Timber Management Area where reforestation may well be virtually impossible but most of these areas are located in the Fisheries/Wildlife Area. In any case, Forest Service policy is to avoid harvesting areas which are not reforestable.

4. Massive land movement, due to excavating highly unstable soils, is quite likely.

Response - We do not agree. We have found the techniques called for in the PROPOSED ACTION are effective in minimizing accelerated soil movement and keeping the actual total quite low.

5. The likelihood that the buffer strips along the Class I and II streams will be partially blown down is very high. This could result in the virtual destruction of the Elk and Sixes River salmon runs if water temperatures are increased, if siltation becomes too severe, if the stream channels become plugged, or if a timber dam builds and breaks as happened in Butler Creek years ago.

Response - We disagree. Refer to the Response to Comments No. 1 and 2, Letter No. 27.

6. The cost of logging and road building in the Unit will be so high, that there will be very little profit left in the logs. What if access money is unavailable? Will you then remove larger acreages of timber initially to pay for the roads?

Response - Refer to the Responses to Comments 6 and 7, Letter No. 27 and to the Response to Comment No. 10, Letter No. 1.

7. Logging will destroy the remaining habitat of several rare and endangered species.

Response - We disagree. Refer to the Response to Comment No. 18, Letter No. 27.

Letter No. 42 - Jim Rogers

1. What would be the potential damage to the fisheries resource if the buffer strip (either a small or a major portion) blew down in a) Dry Creek b) Anvil Creek and c) Redcedar Creek?

Response - Redcedar Creek never contained a Fisheries/Recreation Area in either the draft or final PROPOSED ACTION. The Fisheries/Recreation Area on Anvil Creek in the draft was deleted in the final in favor of a Fisheries/Wildlife Area designation for the entire Anvil Creek drainage. The final PROPOSED ACTION calls for a Fisheries/Recreation Area along both Dry Creek and Rock Creek.

Based on the experience of staff specialists, we believe the possibility of extensive blowdown in the Fisheries/Recreation Areas is not much greater than the "natural" rate. Even if the highly unlikely possibility of substantial blowdown should occur, damage to the fisheries resource would be slight to moderate for several years. However recovery likely would take place within a few years after the blowdown.

2. Based on past successes and failures in maintaining buffer strips, what is the likelihood of these buffer strips remaining relatively intact?

Response - The Fisheries/Recreation Area must be distinguished from the classical concept of stream buffers. Classical buffers typically have been 200-400 feet in width while the Fisheries/Recreation Area is a minimum of 1,320 feet (and often much wider). While some blowdown usually can be expected in classical buffers, our experience has been that these buffers remain relatively intact. The much larger Fisheries/Recreation Areas should be maintained.

3. Is there a likelihood of severe cutbank ravelling, and if so, has any method yet been devised to prevent, or at least significantly minimize this problem? Grass seeding seems to be of little benefit on steep cutbanks. How many cutbank failures per mile can be expected in the area according to the Cutbank Stability Reconnaissance Survey?

Response - Severe cutbank ravelling in general, will not be a major problem with the ridgetop road system under the techniques called for in the PROPOSED ACTION. Grass seeding is an effective erosion control measure in most situations.

The Cutbank Stability Reconnaissance Survey was completed in 1963. Five stability classes were recognized, ranging from very stable to very unstable. Estimates of cutbank failures per mile were made

based on a set of assumptions, one of which was the roads with subgrade widths of up to 26 feet would be constructed. Based on these assumptions, the Survey indicates that there is at least a 50% chance that 4 to 8 failures in excess of 10 cubic yards will occur per mile of road cutbank. However, the Forest Soil Scientist finds these estimates too high based on current road construction standards which have limited subgrade widths of 16 feet or less. A more reasonable estimate based on current assumptions would be that there is at least a 50% chance that 2 to 4 failures in excess of 10 cubic yards will occur per mile of road cutbank on the ridgetop system. Further, almost all of these will be small (near the minimum yardage specified) and the impact limited to the road and the immediate area around it. The probability of massive failures is very small.

4. How much turbidity might be expected in the primary spawning streams as a result of this ravelling and what result might the potential amount of turbidity have on salmon spawning?

Response - Severe cutbank ravelling, in general, will not be a major problem under the PROPOSED ACTION. The relatively small amount which may occur will not significantly adversely impact salmon spawning as we have already stated in both the DES and FES.

5. Is the question of the possibility of massive soil movement in logged off areas a valid concern in your estimation?

Response - Based on observations of many hundreds of harvest units on the Siskiyou National Forest, including those in Butler Creek and many in terrain similar to that in the Unit (from 1 to more than 20 years old), we have found little evidence of mass soil movements being triggered by cutting trees.

6. What is the actual estimated cost of the road system (based on current figures)?

Response - The \$5.57 million road system will be constructed over a period of 30 years.

7. Are there excess debris disposal areas within feasible hauling distances?

Response - Adequate disposal areas have been located within and near the Unit to store end haul material.

8. Will the 30 mile road plus 4 mile ATV trail be sufficient to log the entire area?

Response - The PROPOSED ACTION in the FES calls for 31 miles of new road construction to supplement the 9 miles of existing road. This system will be sufficient to log the Timber Management Area.

9. Are adequate tailholds available to skyline log the land currently being considered for the system? What is the current cost for skyline logging in this terrain?

Response - Refer to the Response to Comment No. 10, Letter No. 27 in reference to tailholds. Skyline logging costs vary depending on a number of variables. Stump to truck costs (truck loaded) on recent sales in comparable terrain have ranged from approximately \$30 to \$45. These costs appear to be representative of the low and the high extremes.

10. Have helicopters actually proven economically capable of lifting fir out of a deep canyon and up to a ridgetop road? What is the estimated cost for this type of operation?

Response - Yes, helicopters have proven themselves economically feasible under similar circumstances. Yarding costs differ depending on a number of variables but usually are substantially less than \$75/MBF.

11. Is it feasible to construct the large landings needed for helicopter logging in this area?

Response - Yes. A sufficient number of potential sites have been located in the Unit.

12. Are you aware of any other methods which might be available in the foreseeable future to log the area without the problems entailed in skyline and helicopter logging?

Response - Helicopter and skyline systems are the most feasible logging systems for this area. The balloon systems in operation are not particularly well-suited to the nature of this Unit. Multi-span skyline systems could become feasible for second growth at some point in the future.

13. Do you expect regeneration to be satisfactory to the extent that a perpetual annual harvest of 5.5 million board feet will be sustainable over an infinite period of time?

Response - Yes. (The estimate for the revised PROPOSED ACTION appearing in the FES is 4.9 million board feet. The difference between the two estimates is due to fewer acres in the Timber Management Area in the FES.)

14. Is there a likelihood that the Spotted Owl population will be eradicated on the Forest or do you feel there will always be sufficient (population)?

Response - Nearly 10% of the Forest currently is being managed to preserve or to largely retain existing ecosystems. The figure for this Planning Unit is 45%. On the basis of known habitat requirements for the northern spotted owl and on the above information, we believe that adequate habitat will be available to support a substantial population of the species on the Siskiyou National Forest.

15. What areas, specifically are being considered for exchange in and adjacent to the Unit, and what are the dollar values being assigned to these lands?

Response - The National Forest lands north of a retraction line running along the north side of sections 19, 20, 21, 22, 23, and 24 (T.32S, R14W) will be available for exchange. One of the main purposes of retracting the National Forest boundary is to consolidate land ownership patterns. Values are determined through an appraisal process for each particular exchange transaction.

16. Is YUM yarding proposed, and has it proven to be silviculturally beneficial or detrimental?

Response - YUM yarding will be accomplished where it is determined to be necessary and beneficial. From a reforestation standpoint its overall impact has been neutral - with slightly positive impacts in some situations and slightly negative impacts in other situations.

17. The estimate of precipitation in the Unit seems far too low. If there is actually 50% more precipitation than originally estimated, would this make any difference in your management activities?

Response - Refer to the Response to Comment No. 12, Letter No. 27.

18. Do you anticipate minimum and maximum water levels in the Elk to become more extreme when additional timber is removed from its watershed?

Response - No. Very little of the Unit in the Elk River drainage will be accessed for timber harvest. Butler Creek, which is already partially developed, accounts for most of this acreage. Even this creek will not have its flow patterns altered substantially under the PROPOSED ACTION.

19. How were timber volume estimates made, and if future estimates indicate more or less timber in the area, will the allowable cut in the Unit be correspondingly increased or decreased?

Response - Refer to the Responses to Comment No. 14, Letter No. 27 and to Comment No. 1, Letter No. 29.

Letter No. 46 - Brice Wagner

1. I only hope that you and the rest of Forest Service personnel can continue to decide how to manage the entire Elk River watershed with a minimum of damage to the entire Elk River Resource (timberlands, fisheries, agriculture)... Careful management of the timber harvest of Elk River watershed will benefit everyone, now and future generations. As you know, soils cannot be replaced from erosion, and silt in the stream benefits no one.

Response - We believe the PROPOSED ACTION will maximize the net public benefits by producing a sustainable flow of goods and services for people while protecting the various resources in and adjacent to the Planning Unit.

Letter No. 47 - William L. O'Sullivan

1. On page 37 under Management Objective's it states, "management activities must protect and, where practical improve water quality..." However, on pages 33, 34, 42, 74 and elsewhere shows this simply is not the case. ("The Proposed Action will cause some adverse impacts to the Fisheries resource." p. 44).

Response - Refer to the Response to Comment No. 12, Letter No. 25.

2. On page 23 the statement says, "Any increase in water temperature in Elk River,... could put the hatchery out of operation." The net value of timber and jobs is \$750,000 per year (p. 74). Yet, the Forest Service is willing to gamble that a \$1,537,000 Fisheries resource (p. 19) will not be destroyed. "... could have a large negative impact on Fisheries resources within the unit." (p. 19).

Response - The Description segment of the DES and FES describes the situation relevant to the land use decision. Some potential impacts are also discussed. The Environmental Impacts segment describes the impacts that could occur as a result of implementing the PROPOSED ACTION and estimates the liklihood and/or magnitude of such impacts. The probability of the Elk River Fish Hatchery being significantly adversely impacted under the PROPOSED ACTION is extremely small - approaching zero.

3. In the Port Orford area there are no mills in operation at this time. The economic impact of the Planning Unit may very well have little effect, except to the commercial and sports fisheries - and that will be a negative one. Since the mill capacity in Curry County is double the potential annual harvest, we can hardly expect much improvement in this area. Economically, Port Orford can not stand a reduction in other economic areas, (i.e., the fisheries resource). We need economic diversification (see p. 11).

Response - There are five sizeable wood products mills operating along the coast within 25 air-miles of the Unit. One of these is located in the immediate Port Orford area. The mill capacity to land capability ratio for Curry County actually is considerably better than the average (roughly 2:1 by some estimates) for the five Southwestern Oregon counties.

There will be little, if any, adverse economic impact to the fisheries industry. In fact positive economic impacts will occur to the recreation and tourist industry.

4. Perhaps the most obvious weakness in the statement is a failure to convince me that the roads to be built in the area will not cause severe

problems. The average slope of the Planning Unit is 80% (p. 4, p. 12). Yet on page 108 (Road Construction) it states that 60% slopes have a 70% chance of being unsatisfactory. On critical soils road building had a 90% unsatisfactory rate. In the Planning Unit the area is composed of 90% critical soils (p. 13).

It is stated on p. 21, that "... more sophisticated road construction and timber harvest techniques have been used elsewhere on the Siskiyou National Forest." (p. 21). If that is really the case, why doesn't the engineers report reflect that? What are these so-called sophisticated techniques? Do they really work? Or, does the Forest Service have to experiment on the Mt. Butler-Dry Creek area to find out? Will the Forest Service quit road building if it isn't successful?

Response - Appendix E contains part of the Region 6 (Oregon and Washington National Forests) Timber Purchaser Road Construction Audit report.

This report was the result of an audit of 63 roads built in the National Forests of Region 6 prior to 1973. The purposes of the audit were outlined in the report:

"The audit approach was designed to provide a critical review of present practices as a means of achieving improved performance. In no way should this effort be regarded as a lack of recognition for the improvement in purchaser construction that has taken place over the past several years. Ample demonstrations are available throughout the Region to prove otherwise. The 2400-6 Timber Sale Contract and the authorities designated to Engineering Representatives should further aid the positive aspects of the purchaser road program." (emphasis added)

"The recommendations in the report are intended to be implemented on all our road projects regardless of the method employed to finance the construction. Therefore, these recommendations apply to timber purchaser, share cost, force account, special use, and public works construction."

"We believe that the recommendations presented in this report will pave the way for responsive actions that will achieve an excellent transport system." (emphasis added)

These recommendations as well as other sophisticated techniques have become standard when roads are constructed in difficult terrain. Further, they've been proven successful on the Siskiyou and elsewhere in terrain similar to that in the Planning Unit.

5. "The rock mulch... may cause regeneration problems." (p 32) If that is the case, then the area should be 100% replanted.

Response - Refer to the Response to Comment No. 3, Letter No. 41.

6. Why is it that wherever a problem is discussed in the statement it says, may cause damage or might do this or that, yet when the Forest Service proposes an action to correct a problem the statement always says will? Example: "Although Soil Management Policy, timber harvesting techniques, and road construction will minimize accelerating soil erosion..." (p. 48) What do you mean will? You mean Might.

Response - We mean will. Problems could or may develop but measures to avoid the problem or to minimize it will be implemented.

7. Appendix F. Analysis of the opinion and reasons given by respondents to the brochure detailing the options depends entirely upon who received those brochures. A survey of this kind in no way could be considered the views of the general public.

Response - Agreed. See the Response to Comment No. 21, Letter No. 25.

Letter No. 49 - Thomas E. Horobik

1. Roadless area B11 was originally incorrectly inventoried. A latter addition was listed as a separate roadless area even though contiguous to the original area. Additionally, uninventoried roadless acreage appears to lie to the east of B11. Since B11, B13, and any uninventoried roadless resource have never been afforded a study as the singular unit they are, all past studies of this resource are invalid.

Response - We disagree. However, this non-selected inventoried roadless area plus additions have been reconsidered for Wilderness Study designation in this Land Use Planning process (see Alternative 1, DES and FES).

2. A QI-rating of 57 for the roadless area (B 11) even if accurate would be virtually meaningless because it did not include the area not originally inventoried, a purposeful error?

Response - It was not a purposeful error. However, we should point out that the 4,500 acres in inventoried roadless area B 13 add little to B 11 except acres. The suitability as measured by any of several indicators would not vary significantly. Original delineating of inventoried roadless areas sought to include as much land meeting the roadless area definition as possible without resorting to severe gerrymandering of boundaries.

3. 90% of the unit is admitted to have "critical soils" a category that in most cases precludes timber harvest and/or road building.

Response - The critical soils category simply puts up a red flag indicating that special techniques will have to be implemented to avoid serious problems when developing lands so classified. The category does not, as you suggest, preclude either timber harvest or road building.

4. The proposed management further endangers already threatened species with the likely prospect of accelerated extinction. Unless an animal is classed as a game species or is at home in areas newly raped by loggers it is not classed as worthy of special consideration.

Response - Refer to the Response to Comment No. 7, Letter No. 25.

5. The assumptions and objectives listed on pages 37 and 38 clearly indicate that all resources will be considered only in the context of their compatibility with the predetermined timber harvest policies. It is clear throughout the statement that the only environment really receiving consideration is the economic environment. To hell with the future, let's cut them trees.

Response - We disagree.

Letter No. 50 - Gloria J. Dillingham

1. Furthermore, your study indicates that due to many natural conditions the Unit is not suitable for the extensive logging you propose even if danger to the fishing industry were non-existent. For example, on p. 31 you say; "... one of the findings that deserves further study is the relatively low basal area and GBA common to the Unit -- even on many of the better sites." If there is a possible low inherent ability of the land to grow timber and a known potential for severe erosion, the Unit wouldn't seem to be a likely candidate for extensive logging. In addition to these problems on p. 32 you say "The rock mulch, when combined with the steep rocky terrain and summer drought and other factors, may cause regeneration problems. These problems will be particularly present where fragile surface layer is disturbed to any significant extent..."

Response - It is incorrect to jump to the conclusion that the entire Unit is not suitable to any substantial amount of timber harvest based on the above observation. Further, the observation that basal areas and growth basal areas appear to be somewhat low for given site indices does not indicate that the inherent capability to grow timber is low. To the contrary, most of the area in the Timber Management Area is moderately to highly productive for timber production. Regarding regeneration, refer to the Response to Comment No. 3, Letter No. 41.

Letter No. 51 - George R. Shook

1. In short, the problem is a bias in favor of timber production, with the consequent relegation of nontimber resources to an inferior status in the initial planning processes. This bias is evident throughout the draft EIS in a rather subtle way. While a great deal of space is devoted to nontimber resources, particularly in the inventory sections of the report, the analytical processes used to justify the proposed action contain an inherent bias toward timber production. While a cursory glance at the document might suggest a fair treatment of all resources and values involved,

under close scrutiny a rather disturbing pattern of reasoning becomes apparent, a pattern which may be abstracted into the following formula:

1. presentation of quantified inventory data with respect to each of the resources involved in the planning unit.
2. discussion of difficulties and risks involved in implementing the proposed action, also using some quantified or at least verifiable data, frequently in reference to some past action.
3. proposal of solutions to recognized problems, usually without quantified, verifiable data, often without sufficient detail to allow intelligent evaluation on the part of the reviewer.

Response - We believe that the planning process per se is neutral with respect to the various potential uses. We do not agree with the contention that there is no verifiable data to support our proposed solutions to potential problems. The various techniques proposed have been used and proven successful on the Siskiyou National Forest (including on and adjacent to the Unit itself) and elsewhere. Interested persons can verify many of these on the ground. For example, Dixie Creek road (FS #326) heads east out of the Butler Creek drainage. It is an example of a good ridgetop road in rugged terrain. As for harvest units, there are many examples of harvest units stocked or overstocked with healthy reproduction in the Elk River drainage -including most of the units near Mt. Butler in this Planning Unit.

2. Elsewhere in the report (p. 40), one of the new methods suggested is cable assisted uphill felling, one of the objectives of which is to "protect streams and draws." It is important to note that this method, having been rather extensively used for another purpose by a private timber company in the Cascades, is totally untried in the Siskiyous at all, let alone in such a difficult area as the planning unit.

Response - Uphill falling has been used extensively for more than 10 years in the western Oregon Cascades. Because the advantages of the technique, in general, increase as the slope of the terrain increases, the amount of experience in steep, rugged terrain similar to that found in this Unit is considerable. Several timber sales on the Forest currently have uphill felling requirements.

3. The EIS contains questionable qualifications in its commitment to the protection of water quality. If we turn to Appendix C (p.94), for more definite information concerning guidelines for the protection of water quality, we find the definitive statements concerning both turbidity and temperature, those aspects of water quality which seem to be most crucial to the welfare of the fisheries resources, to be compromised by almost identical qualifying phrases - "except for certain short-term activities which may be authorized... and which are necessary to accomplish legitimate uses or activities where temperatures/turbidities in excess of this standard are unavoidable." (ellipses theirs). What uses are "legitimate" for such exceptions? If indeed turbidity and temperature are of such critical importance to the welfare of the fisheries resource, is such a concession to other uses tolerable in the only definite guidelines we find concerning water

quality? Here we seem to have a commitment which is no commitment at all.

Response - The language adopted in Appendix C is taken verbatim from the water quality standards for the Rogue River issued by the Oregon Department of Environmental Quality. The qualifiers recognize the fact that at certain times of the year, these standards can be exceeded for short periods without resource damage. The activities which are likely to require the exception will be primarily culvert and bridge installation operations. In any case, an exception would not be approved by the District Ranger unless it were the consensus of the appropriate specialists (including the Watershed Staff Officer and the Forest Fisheries Biologist) that watershed and fisheries resources would not be significantly adversely impacted.

Letter No. 53 - Dave Corkran

1. The possibility of mass soil movement as a cause of stream sedimentation and siltation is a well documented phenomenon... This phenomenon has occurred on the Siskiyou National Forest with disastrous results in the infamous case of the Bell Divide Road (Oregon Wildlife Commission, Northwest Regional Office, "Mass Soil Movement From Logging Roads, April 1, 1974). It is incredible that in the face of this empirical evidence, the preferred plan should be considered. I believe it to be in direct violation of the Regional Forester's directive of November 19, 1974, requiring the protection of present fisheries from non-degradation (Forest Service Manual Chapter 2630.3, Emergency Directive No. 2).

Response - The Bell Divide Road is on the Siuslaw National Forest. The PROPOSED ACTION is in compliance with Regional policy. In addition, refer to the Response to Comment No. 3, Letter No. 9.

2. Several years ago, Phillip A. Briegleb, then director of the Pacific Northwest Range and Experiment Station stated that each acre of a chinook producing stream produced fish worth \$6,200 per year. That is worth far more than the timber per year to be realized from the Grassy Knob Roadless Area, but you do not seem to realize this.

Response - A small percentage of a stream in which chinook spawn is actually used for spawning. For example, there may be 1/4 acre of useful spawning gravels in a given 10 mile stream which covers a total surface area of 50 acres. The fisheries value produced on that 1/4 acre could vary widely - depending on a number of variables. In any case the per acre rate is very high. Intensive studies on a number of streams and rivers have found the per acre (useful area for spawning) annual value produced to range from \$9,000 to \$350,000. These values are recognized and are reflected in the estimated value of the fisheries resource attributable to the Unit (\$441,000). The comparable annual value of the timber resource in the Unit lies between the gross and net values in the DES (\$1,628,000 and \$438,000). More than 1/4 of this potential is foregone under the PROPOSED ACTION to insure the maintenance of virtually the entire existing fisheries resource and the protection of other resources.

Letter No. 54 - B. M. Bakke

1. The trail system up Dry Creek will only serve to make the stream too accessible and because of open country a trail is not necessary. A trail would only concentrate people and encourage angling which would result in unnecessary pressure on salmonid juveniles rearing in this important spawning stream.

Response - The minimum-impact trail will still present a challenge to the hiker or fisherman. Cross country travel is extremely difficult and sometimes hazardous in this brushy, steep area. Further, few salmonid juveniles actually rear in Dry Creek during most of the year.

2. At this point both the Elk and the Sixes Rivers have lost considerable productivity for salmonid species due to logging on private and Forest Service lands. The Butler Creek drainage has been totally ruined as a fish production stream. High water temperatures, silted gravel and low summer flows have altered these rivers to the point where the rearing habitat has been greatly reduced. As a result of high water temperatures, disease problems are a potential threat in both the rivers and in the Elk River Hatchery.

Response - While both rivers have been adversely impacted with respect to fisheries productivity, the magnitude of the impacts differ markedly. It appears that the fisheries resource in Sixes River was seriously damaged as a result of the rapid liquidation of old growth timber on many of the privately-owned acres in the drainage between the mid 1950's and early 1960's. The impact on the Elk River resource has been relatively light. Butler Creek, seriously damaged around 1960, today hosts a considerable amount of spawning and rearing activity.

3. It seems that logging and road construction are incompatible with fish habitat protection and to the management of a multiple resource base.

Response - They are compatible under the PROPOSED ACTION and other alternatives calling for proper forest resource management.

Letter No. 55 - Craig Smith

1. I have a comment to make about the proposed small buffer zone to be left along Anvil Creek adjacent to the hatchery... If it was logged as proposed in alternative 3 (PROPOSED ACTION), it would have 1) extreme blowdowns from the severe winter winds in this area in the buffer zone along Anvil Creek, 2) blowdowns coupled with this drainage's severe slope would cause severe siltation to occur during the winter rains causing the deaths of what is Elk River's #1 spawning stream.

Response - We do not agree with the above scenario. However, this is a moot point since the PROPOSED ACTION in the FES expands the Fisheries/Wildlife Area to include the Anvil Creek drainage.

Letter No. 58 - Romain Cooper

1. When reviewing a roadless area for possible wilderness classification, the question "How much is enough?" is a common and relevant one. To help the public decide for themselves just how much wilderness is enough, more information is needed.

Response - The Roadless Area Review and Evaluation (RARE), in addressing the question, presented a great deal of information useful to decision-makers. Refer to the Final Environmental Statement on Roadless and Undeveloped Areas, U. S. Forest Service, Washington, D.C. Reference copies also may be available at local libraries or Forest Service offices. Also, refer to the Response to Comment No. 4, Letter No. 25 in this document.

2. I think that considering the emphasis put on RARE quotients, you should show more information on how this data is gathered and processed.

Response - The RARE wilderness quality rating was presented together with other data relating to wilderness character and suitability. Refer to the Final Environmental Statement on Roadless and Undeveloped Areas for a thorough description of this and other analytical tools used in the Nationwide RARE process.

3. A comprehensive evaluation of past actions is indispensable to any scientific management program that seeks improvement and this information should be assembled in a usable form... The evaluation data should address itself to such concerns as 1) net public benefit 2) net profit, 3) soil mass movement or erosion, 4) soil fertility - mineral and humus, 5) water quality, 6) road quality, 7) impact on wildlife, 8) impact on anadromous salmonids, 9) visual impact, 10) reproduction success, 11) growth rate of reprod, 12) impact of fuel-load and brush removal methods, etc.

Response - Evaluation of past decisions and actions is a vital part of management - it occurs continually on the Siskiyou National Forest as elsewhere. The decision selecting the PROPOSED ACTION, the measures called for, and indeed both the DES and FES reflect these evaluations. However, a compilation of the massive volume of data you suggest is beyond the purpose of this DES and FES.

4. In your statement you seemed confident that you could, under PROPOSED ACTION management, protect the fisheries resource. I was skeptical and wrote the Oregon Wildlife and Fisheries Commission... They seemed very unsure of your ability to manage alternatives 3, 4, 5 and not damage fisheries severely and even wanted modifications for alternative 2. Are you going to ignore their expert advice or will you pay heed to their warning?

Response - The Forest Service has consulted with Fish Hatchery personnel continuously since field work in the Unit commenced several years ago. In addition, our expert, Siskiyou Fisheries Biologist Dr. Fred Everest, has been actively involved in the planning process for this Unit. These involvements are reflected in: 1) the range of alternatives

considered; 2) the selection of the particular PROPOSED ACTION found in the DES; 3) the modified PROPOSED ACTION found in the FES; and 4) the information in both the DES and FES.

5. I'm a little confused as to what you mean in your paragraph on roading on page 41 (paragraph 5). Does this mean you plan to put main access roads in little by little or all at once?

Response - The 31 miles of new construction will be completed over a 30 year period.

Letter No. 59 - Reese E. Bender

1. Public input was virtually ignored.

Response - We disagree. Refer to the Response to Comment No. 21, Letter No. 25.

2. Existing roadless areas in Dry Creek and Elk River watersheds are unique, not only from a geological standpoint, but because they make up the last sizeable natural ecosystem in coastal southwest Oregon.

Response - There is nothing unique about the geology of either watershed. The geologic types are found over a wide area. The validity of the assertion that the Unit contains the last sizeable natural ecosystem in coastal southwest Oregon is dependent on the definitions one gives to "sizeable", "coastal", and "southwest Oregon". Given a restrictive enough definition, the "unique argument" can be applied to any acre in Oregon or even in the entire United States.

3. There is practically no background or baseline information from which to measure the changes that will occur if the unit is developed. How does the Forest Service claim to be able to conform to the guideline in Appendix C (p. 94) on turbidity when there is less than one year of background data on Elk River and Dry Creek and none on Rock, Anvil, Red Cedar or Butler creeks?

Response - Refer to the Response to Comment No. 11, Letter No. 1.

4. These new techniques for logging, roadbuilding, and regeneration offer promise of decreasing environmental damage to streams and soils in the future, but these methods should be thoroughly tested and evaluated... I have observed two units on the south fork of Lobster Creek that were skyline logged from near ridgetop roads within the past few years... What will happen to these units 5-6 years from now when the root system of cut trees have decomposed? How well will regeneration take place with the undisturbed understory still present? How well will these new types of roads hold up over 10 or 15 years? The point that I am trying to make is that, at this time, scientists in the Forest Service simply do not know for sure what the long term effects of these new systems will be in a sensitive area like the Mt. Butler-Dry Creek unit.

Response - Evaluation of past decisions and actions is a vital part of management - it occurs continually on the Siskiyou National Forest as elsewhere. The decision selecting the PROPOSED ACTION, the measures called for, and both the entire DES and FES documents themselves reflect this. That is to say decisions are based on a great deal of information, including evaluations of past performances. And all of the techniques called for have been successfully used for some years.

Refer also to the Response to Comment No. 5, Letter No. 42 and to the Response to Comment No. 4, Letter No. 47.

5. P. 3, paragraph 3, "Precipitation averages 85-90 inches annually..." This is not an accurate statement. Weather station Port Orford 5E is located at Elk River Hatchery directly adjacent to the S.W. portion of the Planning Unit. The average annual precipitation for the four complete years of data (1971 - 1974) since the station began operation in January 1970 is 136.0 inches. Precipitation over much of the Planning Unit, especially the higher elevations, may be even greater than the 136 inch average at the hatchery because of the orographic effect that these higher elevation areas have on storms as they pass over the Unit from west to east.

Response - Refer to the Response to Comment No. 12, Letter No. 27.

6. P. 19, paragraph 2, "... the Planning Unit encompasses 22 percent of the Elk River watershed and, assuming that fishery values are evenly distributed within the drainage, approximately 22 percent of the total fishery value (\$271,000) can be attributed to the Planning Unit. The assumption is defensible based on knowledge of the condition of the watershed and distribution of fish..." I don't agree with this statement. Fishery values are not evenly distributed within the drainage. Rock and Anvil creeks are far more important to salmonid production than are any other tributaries within the watershed. Large numbers of returning hatchery salmon do not enter the hatchery holding facility. A high percentage of these fish spawn in Rock and Anvil creeks along with substantial numbers of wild salmon.

Response - Refer to the Response to Comment No. 11, Letter No. 27.

7. Are there sites receiving more than 135 inches of precipitation annually with 90 percent critical soils and slopes frequently exceeding 100 percent where these new methods have been tested over a period long enough for complete regeneration to have taken place and road stability to have been proven? Has the Forest Service extensively tested lined uphill falling on sites like those found in the Mr. Butler-Dry Creek unit? Has helicopter logging been proven economically feasible on sites where there is no Port Orford Cedar; where most of the logs have to be flown uphill to landings with windy conditions prevalent and where many sales require flying the logs one mile or more? Have the projected dramatic increases in the cost of fuel and national fuel conservation goals been taken into account when evaluation proposed helicopter logging? These questions need to be answered.

Response - The answer to each of the questions is yes (except most of the uphill felling has been accomplished on steep, rugged privately-owned lands). Each of these questions have been answered in some detail in earlier letters.

8. P. 37, Management Objectives. "1. Management activities must protect and, where practical, improve water quality for fisheries and other uses." This is not a realistic subobjective. The roadless areas already have extremely high water quality. Under the Proposed Action, the only direction water quality in these areas can go is down.

Response - We do not agree. Refer to the Response to Comment No. 12, Letter No. 25.

9. P. 38, Management Objectives. The body of the EIS is consistent with these objectives except that objective 9 stating that, "The mix of management activities must efficiently use existing budget levels to produce a greater level of total public benefits." isn't even a possibility without some means of assigning realistic values to the non-consumptive resources of the Unit. What is the dollar value of the spotted owl population? Distinct dollar values are provided for fisheries and timber resources but only vague values are provided for non-consumptive resources. These non-consumptive resources will always come out second best, unless some realistic method is developed for assigning a dollar value to them.

Response - We disagree that non-consumptive resources will always come out second best unless a dollar value is assigned to them. It would be unwise to do so unless a fair and realistic method becomes available. Past attempts elsewhere to assign a dollar value to uses which generate a wide variety of benefits, many of which are not easily quantifiable and for which no market exists, have not been notably successful. Usually, part of the benefits are not counted which results in underestimated resource values. In reality, both the relative and absolute value of any given resource varies widely among different people. By showing an array of expected outputs (as quantified as possible) for each alternative, each alternative implies a set of tradeoff points and valuations. In expressing his opinion, each concerned citizen assumes the role of decision-maker and makes the decision for the alternative(s) most closely approximating his own value system.

10. There are too many areas on the forest where no merchantable timber is being regenerated on logged over lands. It is a Forest Service policy not to cut timber where rapid regeneration is not possible, and yet, the Elk River drainage has many examples where this policy was not adhered to.

Response - The facts reject the implication that reforestation on a high percentage of harvested units around the Forest has been unsuccessful. For the Forest as a whole, approximately 80% of the harvested acres are satisfactorily stocked or overstocked within 2 years, more than 95% within 5 years, and about 99% within 10 years. Results obtained in the Elk River drainage, including Butler Creek, have been generally comparable.

11. The statement (p. 40) "The Fisheries/Recreation area contains much of the land and water with the greatest fisheries, aesthetic and primitive type recreation potentials in the Unit." is misleading from a fisheries standpoint. All of Dry Creek is very important as far as fisheries are concerned.

Response - We agree and note that the entire main stem of Dry Creek is within the Fisheries/Recreation Area. Also, the important forks and tributaries are at least partially within the Area. In addition, the Streamside Management Unit Policy and other policies provide protection throughout the Unit.

12. What types of roads and roadbuilding techniques are planned for this Unit? Have these been thoroughly tested in similar high risk areas over a period of ten years or more? I question the cost that you have assigned to this road system. What are the alternatives if the 1.8 million dollars in funds for the roads are not appropriated?

Response - Refer to the Responses to Comments No. 5, 6 and 10, Letter No. 1. Also to the Response to Comment No. 6, Letter No. 42.

13. The word minimize doesn't really say anything. Erosion could be minimized and still be unacceptable (p. 42). Secondary and tertiary impacts could also be minimized but still be unacceptable.

Response - We will minimize the impacts and keep them within acceptable levels. The wording in the FES has been altered to clarify this important point.

14. P. 45, paragraph 2. The EIS states that (in relation to spotted owls), "Few, if any, individuals will exist outside of either the Fisheries/Wildlife or Fisheries/Recreation areas." Little of the old growth, canyon type environment, preferred by the spotted owl, exists within the Fisheries/Wildlife Area. In addition, Elk River Road runs directly adjacent to the southern boundary of this area and either roads or the lack of proper environment could eliminate the spotted owl from this entire Planning Unit. It is unlikely that any spotted owls will remain in the Fisheries/Recreation area with the proposed trail system along the creek bottom and the proposed road systems and logging activities in the higher areas.

Response - We disagree. Refer to the Response to Comment No. 18, Letter No. 27.

15. What degree of herbicide use will be necessary? What guidelines will be used for herbicide application and what type of herbicides will be used? What will be the effects of large scale herbicide applications on wildlife and fisheries?

Response - Herbicides are applied where on-the-ground evaluations show that such application will be beneficial. An Environmental Impact Statement covering the impacts and potential impacts on all areas selected for treatment in southwestern Oregon National Forests is filed with the Council on Environmental Quality (CEQ) annually.

16. P. 48, paragraph 1, Summary of Probable Adverse Environmental Effects Which Cannot be Avoided. I don't agree that the impact on fisheries and soil erosion will be small to insignificant. What specific (quantitative) level of significance is the Forest Service referring to?

Response - "Insignificant impacts" as used in the text refers to impacts which will be relatively unimportant or trifling.

17. P. 49, paragraph 2. I question the statement, in reference to spotted owls, "... that 40% of the present carrying capacity will be sustained." for reasons already stated... What the EIS doesn't point out, is that in a few decades there will be no habitat for this species or for many other species requiring stands of old growth timber anywhere in the region except for the few areas set aside from logging, and most of these contain little old growth timber.

Response - Refer to the Response to Comment No. 14 in your letter.

18. P. 49, paragraph 3. In reference to bald eagles, "In addition, 3-4 snags per acre can be left in harvested areas to provide perch sites, food sources, and potential nesting sites." Would these snags actually be left? Leaving snags is often dangerous to tree fallers and state safety regulations may preclude any snags being left in many areas. These snags are extremely important however, not only for eagles but for a great variety of birds that depend upon them for nesting and/or food. Some provision should be made to insure that there will be 3-4 snags left per acre if the Unit is developed.

Response - Regional policy provides for a minimum of 1 to 2 snags per acre (depending on specified characteristics which vary from area to area).

19. P. 53, Alternatives to the Proposed Action. Alternatives 4, 5 and 6 are not realistic alternatives and should not even have been included in this EIS. Alternatives 4 and 5 are not consistent with the stated overall management objective or with the "subobjectives" listed on pages 37 and 38.

Response - We disagree. The six alternatives represent a wide range of possible land use plans for the Unit as required by the National Environmental Policy Act of 1969 (P.L. 91-190). Each alternative represents a different set of tradeoff points and resource valuations.

20. P. 57. The statement that almost all of the 362 citizen inputs tend to concur with the conclusion that wilderness quality within the Planning Unit is not better than mediocre is ridiculous. I can only find 13 responses (Pp. 115-117) that specifically mentioned wilderness quality and nine of these felt that the area was unique. Grossly inaccurate statements such as this tend to destroy Forest Service credibility.

Response - Respondents to the brochure in general, and those advocating either alternatives 1 or 2 in particular, listed their primary reasons to explain why they preferred or disliked each of the alternatives. Of the 400 reasons given in support of alternative 1 (wilderness study), less than 5% argued wilderness based on some unique aspect. This is both remarkable and significant in light of the general overuse of the term "unique" in matters of this nature.

21. Pp. 78, 79. The Forest Service requested comments on this EIS from nine state sources. Comments were requested from Oregon State University School of Forestry but not from Oregon State University Department of Fisheries and Wildlife. Why?

Response - Comments on any DES are requested from State agencies through the State of Oregon Clearinghouse which was established to insure that appropriate State agencies are given the opportunity to respond. Our mailing list supplied the names of other interested parties. Finally, any interested person, agency, or organization has the opportunity to respond if he or she so desires. In fact Dr. James Hall of the OSU Department of Fisheries and Wildlife did respond as an interested citizen.

22. P. 94, Appendix C. The standards set for turbidity and temperature are impressive except for the clause at the end of each of these which states, "... except for certain short-term activities which may be specifically authorized... and which are necessary to accomplish legitimate use or activities were turbidity/temperature in excess of this standard are unavoidable." What specific activities are being referred to? These two very important standards are meaningless without further qualification. There are certain times of year when any increase in turbidity or temperature would be unacceptable from a fisheries standpoint.

Response - We agree that at certain times of the year the standards should not be exceeded. However, at other times during the year exceeding the standards for short periods will not result in any resource damage. Refer to the Response to Comment No. 3, Letter No. 51.

Letter No. 60 - Lyle D. Curtis

1. Because of exposure of small feeder streams not protected by the buffer strip afforded the main streams (Dry Creek, Anvil Creek, etc.) water temperatures would be raised in the tributary streams as well as the main river. These increased temperatures could very likely have adverse effect at the Elk River Hatchery, as well as causing evaporation bringing about reduced stream flows.

Response - We disagree. The Streamside Management Unit Policy affords protection to streams of all sizes.

Letter No. 64 - Joe Casprowiak

1. Why is it absolutely necessary to keep cutting the virgin forest when there is so little of it left in the first place? Why do we keep selling those forests when the will of the people is so against it?

Response - In the case of the National Forest, the forestland provides a wide variety of benefits to the aggregate general public - wood, water, wildlife, fish, forage, recreation, various amenities, etc. The various interest groups within the aggregate public each have their own preferred patterns of land use and output mixes. Most of these preferences are in conflict with each other to at least some degree. The Forest Service tries to be responsive to all of these groups while at the same time maximizing the total net public benefits for the aggregate group. The PROPOSED ACTION is an example of such a compromise land use plan - while it appears that none of the interest groups got everything it wanted, each got much of what it wanted.

With further respect to your second point, compare the summary of the public response to the alternatives brochure with the public response to the DES (Appendix). Also, refer to the Response to Comment No. 21, Letter No. 25.

Letter No. 67 - Lorne Swearingen

1. In close scrutiny on that portion of the report dealing with the fisheries (pg. 15-23), I find a comprehensive study and projection as to the economical value of the fishing industry. If this type of study is to be included in a portion of the study, it should remain consistent throughout the report. I am, of course, referring to the incomplete economical study of that portion of the report which deals with the timber values, direct and indirect in harvesting the timber crop.

Response - Refer to the Responses to Comment No. 1, Letter No. 22 and Comment No. 1, Letter No. 26.

Letter No. 70 - Daniel E. Small

1. Another point regarding logging that needs to be answered is: Can the Mt. Butler-Dry Creek areas proposed for extensive logging be reforested? Don't other areas of adjoining lands now remain barren?

Response - Yes, they can be reforested. Refer to the Response to Comment No. 10, Letter No. 59.

2. Another point of great concern to me is the fact that the fisheries potential of the area would be seriously damaged by extensively logging, because of the great amounts of debris spreading into the rivers and

streams of the area, making them more turbid than they already are.

Response - The PROPOSED ACTION will maintain water quality and the fisheries resource at near-existing levels.

Letter No. 75 - Wayne P. Thomas

1. Now for the subject of fishing. I feel sure the public knows you are trying to protect the fish hatchery and its operation. What they are concerned about is that your roads will open up other tracts of timber to private bidders. Since you do not have any control over these private bidders at this time, they can do very much as they please.

Response - There is no privately-owned lands either within the Planning Unit boundaries or adjacent to the Unit which are not now accessible but would be accessed under the PROPOSED ACTION. Timber harvest on National Forest lands are planned, laid-out, and rules set by Forest Service specialists. The bidder who buys the sale must meet the specifications in the timber sale contract. A Forest Service timber sale officer administers each sale to ensure compliance.

2. People like to take their Hondas, Snowmobiles, and family pets with them to wilderness areas. Unless there is some form of patrolling by some one with authority, the public can not only hurt themselves but the whole environment. Are there going to be gates or check points to check people in and out? Are there going to be Forest Rangers? Are there going to be Fire Patrol Stations? None of these questions were asked or answered at the meeting. These are items for considerable thought and planning. Are you making plans to inform us, the public, what your thinking is along these topics?

Response - Motorized vehicles are generally prohibited in Congressionally-designated Wilderness (such as the Kalmiopsis Wilderness on the Siskiyou National Forest). In general, ORV's are unsuited to the conditions found in this Planning Unit. A Forest Off Road Vehicle (ORV) plan is being formulated. This plan will delineate specific areas where ORV's may or may not be operated, or may be operated under certain conditions.

Current administration and fire prevention and control policies will continue for the area.

Letter No. 77 - Vance Noble

1. One of the pressures already apparent is the plan to use helicopter logging. Where helicopter sales have been made in the past, stumpage prices were very low. The bids reflect monopoly. These low prices constitute a giveaway of a public resource. I am aware of the arguments for such logging, but if timber cannot pay its own way it should not be logged. There is no excuse for privileged treatment in the administration of our federal forests.

Response - Refer to the Response to Comment No. 20, Letter No. 25.

Letter No. 79 - Bill Lemoine

1. The timber values in the planning unit do not reflect high volumes per acre and the high cost of road construction would challenge economic feasibility of logging this area. One must consider high annual maintenance costs on such an unstable area.

Response - The Unit contains an estimated total volume of more than 572 million board feet (MMBF). This averages out to 33.5 MBF per acre for all conifer types - old growth, second growth, and sapling stands (a moderately high figure for such an average). Road construction and maintenance were included in the economic analyses of the PROPOSED ACTION and its alternatives.

2. The volumes per acre stated on page 29 of the EIS did not give the "mean" volume per acre, standard deviation or "sampling error". However, on another page such specifics as GBA₁₀ is mentioned.

Response - Refer to the Response to Comment No. 14, Letter No. 27.

3. The EIS report mentions such safeguards as the "most sophisticated" logging methods and road construction techniques (p. 23) but never mentions what these methods and techniques are. This is an obvious oversight. Different methods can make big differences on any logging show.

Response - Specific needs are dependent upon the characteristics of each individual area and therefore can be determined only at the project planning level. However, throughout the document fairly specific references are made indicating the type of techniques that will commonly be required within the Unit.

4. The brushy slopes all along the Elk River on private land are indicative of the tough reforestation problems. The private land within the planning unit itself has had only marginal results from re-stocking efforts. We are no longer in a situation in which we say we "think" we can reforest. We have acres and acres of unstocked, previously logged areas in which our efforts to reforest have failed miserably. We need not venture forth on areas where reforestation efforts are marginal or in doubt.

Response - In the past, reforestation efforts on many privately-owned lands, especially small ownerships, were minimal to non-existent. Planting was rarely undertaken. On National Forests, Forest Service policy has long recognized the necessity of reforesting harvested lands. Refer to the Response to Comment No. 10, Letter No. 59 for further information relating to this matter.

Letter No. 81 - Townsend W. Dillingham

1. By the Forest Service's own admission it is clear that many of these new techniques are based on theory and not based on demonstrated proof.

Response - Untrue. Refer to the Response to Comment No. 4, Letter No. 59.

2. Doesn't the Forest Service have a legal responsibility to hold advertised public meetings in the area most affected by their actions?

Response - Public meetings are not required. However, we do make information available to the general public about the Unit and planning process for it and also solicit comment from any interested person, organization, or agency. In the case of this Unit local persons were consulted during the data-gathering stage several years ago. Within the past two years two brochures, a full-day public workshop, and a Draft Environment Statement have been widely advertised and made available to any interested party. A number of persons from the Port Orford area have actively taken part and been responsive to all of these opportunities.

Letter No. 83 - Jerry P. Becker

1. What methods will you use to gain regeneration?

Response - Planting will be the predominant method of regenerating. Natural regeneration is a secondary method which will supplement planting.

2. Why did you not have an alternative that would withdraw the Mt. Butler area from intensive timber management until it is proven that all units there can be successfully reforested. Or on the other hand, why was this already roaded area included in the planning unit with roadless areas?

Response - Butler Creek was a logical part of the Planning Unit and was a part of the study which commenced in 1970. Of the more than half a dozen harvest units in Butler Creek, only one has been resistant to adequate reforestation. This unit, harvested around 1960, was broadcast burned with a hot fire - the predominant reason for the reforestation problem. Unburned units in the drainage are all stocked or overstocked. The PROPOSED ACTION, of course, calls for the virtual exclusion of broadcast burning.

3. How much will it cost to build all the roads you propose?

Response - The \$5.57 million road system will be constructed over a period of 30 years.

4. Why did you ignore the scientific information you received?

Response - We haven't ignored any of the available information.

5. Why must there be any logging in these roadless areas when there is so much to lose?

Response - Refer to the Response to Comment No. 1, Letter No. 64.

Letter No. 84 - Mary F. Weideman

1. What real role does public input have on your decision? The analysis of public response shows the people overwhelmingly favor alternatives 1 and 2 over the PROPOSED ACTION. How can it be that Alternative 3 remains in your favor? Is it because the opinions of the forestry experts override the opinions of the people? This is part of the Siskiyou National Forest and belongs to the public and our voice need to be heard.

Response - Refer to the Response to Comment No. 21, Letter No. 25.

Letter No. 85 - Paul Reimers, et al.

1. The new methods of tree lining, fully benching roads, end hauling and piling of waste material, cutting very high backslopes and logging with helicopter and skyline systems over long distances are all in experimental stages and have not been tested under the especially difficult conditions in the Planning Unit.

Response - The ridgetop road system called for in the PROPOSED ACTION minimizes the number of areas with high backslopes because grades will be rolled to keep the roads on the ridgetop to the maximum feasible extent.

The techniques referred to have been proven in terrain comparable to that in the Unit elsewhere on the Siskiyou National Forest.

Letter No. 87 - Fred Swanson

1. Each of the proposed new methods of uphill felling, constructing fully benched roads by cutting high backslopes and end hauling, and logging with skyline and helicopter over long distances is extremely expensive both in terms of capital and operating costs. This will mean heavy resistance from timber purchasers and low dollar return to the public.

Response - High backslopes are minimized under the PROPOSED ACTION. Refer to the Response to Comment No. 1, Letter No. 85.

These techniques are relatively more expensive than traditional standard techniques. However, they are economically feasible. The tradeoff here basically is much greater benefits in terms of environmental protection at a somewhat greater monetary cost. We believe this tradeoff is a good one.

2. There are few places to pile waste, end-haul material in that steep country, so there will be long, costly hauls and high probability of improper spoil placement which can result in massive slides and reactivation of old slumps.

Response - A sufficient number of satisfactory disposal areas have been located within and near the Unit. Under existing engineering practices, the probability of improper spoil placement in these areas is extremely low. We've recognized the costly end haul to stable disposal sites in the economic analysis.

3. The high backslopes of fully benched roads will be cut into rocks which are broken by numerous joint surfaces and small faults where rock falls can be initiated both during and after road construction. This is a predictable problem with high cut slopes.

Response - Proper perspective requires that it be recognized that the number of high backslopes resulting from the ridgetop road system under the PROPOSED ACTION will be minimized and will account for a relatively small percentage of the road mileage. In those areas where they are necessary, it must be noted that joint surface and small fault failures are basically small volume failures and are thus primarily a maintenance concern. Geotechnical investigations prior to road design are usually able to locate the larger potential problem areas. Often roads can be located around these areas. Also, where necessary, preventative devices such as retaining walls can be constructed in potential problem areas.

4. The proposed road system shown in the statement leaves large areas more than 1/2 mile from a landing and some areas more than 1 mile away. I cannot see how it will be economically and technically possible to log over long distances in country where it is extremely difficult to get good tailholds, maintain wide buffer strips and still have cutting units of small to moderate sizes.

Response - Both skyline and helicopter yarding systems will be used in this Unit. Logging systems feasibility was carefully evaluated throughout the Unit during formation of the land use alternatives. This evaluation included both technical and economic feasibilities.

5. The Forest Service justifies the Proposed Action with the idealistic assumption that new methods will prevent old problems. However, there are many reasons to doubt that this will be true. What are the contingency plans for areas where minimum impact logging and roading methods cannot be used? Will areas where helicopter logging is planned be managed in the undisturbed state if helicopters cannot be used? What assurances are there that the area won't be opened up with promises of careful management, but that in 10 years we will see standard and unacceptable practices being used with the excuses of economic and technical constraints? These types of questions should be specifically addressed in the statement.

Response - Techniques called for have been proven successful under similar conditions on the Siskiyou and/or elsewhere. Further, it has been determined that they are feasible in this Unit. Finally each of the alternatives, including the PROPOSED ACTION, is a feasible one in terms of technical and economic operability.

6. In addition to the destruction of the many values of preserved ecosystems, the Proposed Action would have unacceptable impacts on fish and wildlife values. In fact, the Environmental Impact Statement acknowledges that the Proposed Action will have moderate impact on fish habitat. Isn't this in violation of the Fish Habitat Management Policy of Region 6?

Response - We disagree with the first contention. The answer to the question is the PROPOSED ACTION does not violate the Regional Fish Habitat Management Policy. Refer to the Response to Comment No. 3, Letter No. 9.

7. Buffer strips are likely to suffer heavy blowdown in this coastal area of high winds, thus leaving streamside areas unprotected.

Debris avalanches triggered high on logged and roaded slopes will cut down through the buffer strips, thereby setting up debris jams which may block fish movement and otherwise disrupt the fish habitat.

Response - Both scenarios are highly improbable. We believe the possibility of either scenarios occurring is only slightly greater under the PROPOSED ACTION than under existing natural conditions.

8. Much of the habitat for old-growth adapted wildlife will be eliminated, and those areas that are proposed for preservation appear to have been selected on the basis of other considerations (timber productivity, streamside protection, etc.) rather than in terms of maintaining the best old-growth habitat.

Response - Refer to the Response to Comment No. 10, Letter No. 2.

Letter No. 95 - Dee Hustead

1. I question the comparison of fisheries values and timber values. It seems to me that not all the economic impact of the timber resource has been considered, but even under the measuring system used, it is pretty important to the coastal area. I also question whether steelhead fishermen average a net economic benefit of \$20.00 per day as stated on page 16. I believe they generate some such amount in the area, but all they get is the happy experience.

Response - Refer to the Response to Comment No. 1, Letter no. 26 regarding timber resource values. Refer to the Brown and Mathews references listed on page 16 (DES) regarding fisheries values.

Letter No. 96 - Roberta B. Shook

1. I urge you to follow the course compatible with your own EIS and judged by experts to be the right one.

Response - Based on all available information, we believe that the PROPOSED ACTION (FES) is the best course of action for this Planning Unit.

Letter No. 101 - Blair A. Holman

1. I am not in agreement with the Forest Service's decision to include large areas of private ownership within the planning unit. I believe the boundary lines, especially on the North side of the unit, could be withdrawn to eliminate the need to acquire private land holdings. Acquisition of private land holdings remove land from the local tax rolls and provides no incentive for local property owners to effectively manage their lands.

Response - The land use planning for this Unit is applicable only to the 22,100 acres of National Forest within the boundaries. The 4,200 acres (mostly privately-owned) are not subject to these plans. Further, none of the alternatives in the FES proposes acquisitions of these lands. Several alternatives, including the PROPOSED ACTION, call for making certain National Forest acres available for exchange with private land owners in the interest of consolidating land ownership patterns and for other reasons.

Letter No. 102 - William R. Poppe

1. Concern for the fisheries resource is borne out by the incongruities in the comparative data on pages 74-76 of your Draft Environmental Statement. Under proposed alternative 3 moderate impact is expected for annual fish harvest value. This can only be a half truth considering the increase in salmon prices which control their net dollar value. Only slight impact is also expected on the Elk River fish hatchery, already operating at the extremes of water temperature limits controlled by water runoff volume, timing, and siltation. Likewise only slight impact on the commercial fish harvest and sport fish harvest is anticipated. The moderate and slight relative impacts do not balance. The definition of the term moderate is not given. What is moderate to one party may be extreme to another.

Response - The impact of the PROPOSED ACTION (FES) on the Elk River fisheries resource will be slight. The impact on the Hatchery will be virtually non-existent. The impact on the Dry Creek fisheries resource will be marginally greater than slight - a moderate impact tending towards a slight impact. The overall impact on the entire fisheries resource will be slight.

2. You cannot logically claim adverse socio-economic impact on the local environment for proposal number 2 when no such dependence on said portion of the environment currently exists. Indeed the proposed action will decrease the socio-economic impact of the fisheries portion of the environment which currently exists to a considerable volume of dollar flow.

Response - As pointed out in the text, the resources in the Unit currently contribute to local, regional, and national economic activity. In the case of the timber resource we estimate that the Unit currently contributes (on a relative basis) between 5.0 and 5.5 million board feet annually to the Forest's programmed annual harvest - even though few of these logs actually were grown in the Unit. The reason for this is that the calculation of the programmed annual harvest is based on the existing timber volumes and capabilities of all lands on the Forest considered commercial timberland. Most of this Unit was considered commercial timber land at the time of the last calculation. Therefore, a net withdrawal of such acres in the Unit would in turn reduce the Forest's programmed annual harvest.

As stated in the response to your first comment above, the impact of the PROPOSED ACTION on the fisheries resource will be slight.

Letter No. 103 - Randall and Carol Sutton

1. The use of herbicidal sprays such as 2,4-D and 2,4,5-T to "knock back the brush". Use of such chlorinated hydrocarbon sprays on East Coast timber areas resulted in reductions in crab populations offshore, at only a few parts per million in streams feeding these estuaries.

Response - Refer to the Response to Comment No. 15, Letter No. 59.

VIII. APPENDIX

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1/ Policy and standards existing as of January 20, 1975. However, policy and standards evolve over time as new information and concerns emerge. At any given time, the most current policies and standards will be applicable.

APPENDIX A

TITLE 8200 - LAND USE PLANNING

8200 - POLICY

Soil Management Direction. Land management objectives, with special emphasis placed on the protection of soil values on the Siskiyou National Forest are as follows.

To manage the forest land outside of developed recreation sites and dedicated areas with timber as the key use and sustained high level production of quality timber as the primary goal. However, optimum consideration of all other resource values will be recognized consistent with the primary goal.

To manage all other resources under a Multiple Use Plan consistent with the preceding objectives.

Management Situation. The Principal Forest Resource Zone is characterized by intense competition for all occupancy-type of uses, particularly in the valley bottoms. Typical occupancy uses include highways, administrative sites, service and recreation areas, rights-of-way for power lines, pipe lines, power and irrigation projects, and water storage projects. Demands for timber are also extremely heavy. Big game uses the same areas as both summer and winter range.

The Principal Forest Resource Zone contains some of the highest quality and heaviest yielding timber stands in the United States, constituting a significant percentage of the commercial timber reserve of the nation. The National Forest timber in this zone is extremely important to the timber industry of Oregon.

The major habitat for native and anadromous fish is located in the Principal Forest Resource Zone. It is also an important habitat for small game and upland birds, and for migratory waterfowl. It supports more man-days of hunting and fishing use than any other zone.

The Principal Forest Resource Zone poses many difficult multiple use decisions because many of the resource uses attain their highest economic value here, and competition is correspondingly intense.

Management Direction Applying to all Zones and Units - Soil and Water Values.

The following three paragraphs are overriding in all resource management activities. They are derived from the Multiple Use-Sustained Yield Act which directs the management of National Forests without impairment of the productivity of the

TITLE 8200 - LAND USE PLANNING

land. Application of all objectives for the individual Resource Management Zones, Landscape Management Units, and management units must conform with these considerations.

Soil is a basic element in National Forest management. Management of all resources will be planned to keep soil in place; to maintain and/or improve its ability to absorb and store rainfall; and to produce plant growth. Practices that improve present soil conditions will be given preference.

Land and resource uses necessary to support an economic activity often cause soil dislocation and have adverse effects on watershed values. Such dislocations will be held to a minimum with preventive or corrective measures being specified and applied. Soil rehabilitation measures will be taken promptly where needed. In potential soil problem areas, the effect of projected uses will be evaluated by soil technicians. This information will be used by the line officers in applied management.

Water is also a basic resource because of its inseparable relationship to soil values and the productivity of land. It will be given primary consideration by managers to provide optimum yield of usable water in stable streamflow or subsurface supply. This will be done by maintaining the hydrologic balance between soil, water, and plants to obtain the best possible performance of the watershed. The quality of water will be restored, maintained, or improved by reducing sediment content through preserving stability of soil on watershed slopes and along stream channels. The purity, temperature, color, and taste of water will be maintained or improved to the extent that these qualities can be controlled on the land. Water yields and seasonal distribution of flow will be maintained or improved to the extent practicable.

The soils overlays of the District Multiple Use maps stratify each District into four soil management groups. These groups are combinations of the various classifications defined in the Siskiyou National Forest Cutbank Stability Reconnaissance Surveys. These surveys are broad and somewhat general by nature, and should not be used as a final answer. Specific areas should be examined on the ground for correlation with the survey and final decisions based on facts. Restrictions in management for a given soils group will also apply to all other soils groups that are more critical. Management directions for the various broad Soil Management Groups follow. Advance approval of the Forest Supervisor will be required for anything other than a minor deviation from these directions.

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<u>Soil Management Group</u>		<u>Mapping Color</u>	<u>Management Direction</u>
I	A-C	Green	1. Manage in accord with Regional and Forest coordinating requirements.
II	A-C		
III	A-C		2. No tractor slash piling during wet weather (Oct. 31 to May 1). Soil moisture and density criteria to be used in determining when tractor piling will be shut down.
II	D	Yellow	1. Road construction on slopes over 65 percent will require end haul of waste material. Compaction standards should be required in all classes where needed for stability.
III	D		2. All slides will be end hauled and disposed of in designated waste areas.
			3. If recommended by the District Ranger and Soil Scientist, tractor logging will be permitted in partial cuts only on slopes up to approximately 30 percent. In the case of conflicting recommendations, the Forest Supervisor will make the decision.
			4. Skyline logging will be required on II and III D.
II	E	Orange	1. Road construction on slopes over 65 percent will require end haul of waste material out of the soil group to a more stable area.
IV	B&C		2. Intensive erosion control measures will be required in all classes.
IV	D&E		3. In Class IV grade will be rolled and alignment modified to reduce cuts and fills.

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Soil Manage- ment Group	Mapping Color	Management Direction
		<p>4. No tractor logging will be permitted. High lead logging may be permitted on small portions of a unit only if it is obvious that the logs are being yarded into a less critical soil management group.</p> <p>5. A logging system such as skyline, slackline, or modification thereof, designed to keep the leading end of the yarded log continuously off the ground, or fly the entire log free of the ground, will be required. Where practicable, equipment roads will be appraised for machine assistance in installation of anchor points.</p>
V B&C	Red	1. Generally no road construction will be permitted except that short stretches may be constructed with Forest Supervisor approval.
V D&E		<p>2. As a fundamental principle, surface logging contact in harvest cuts will not be planned. This excludes conventional high lead and tractor logging. Skyline, slackline, or modified high lead "flyer" logging systems (or modifications thereof) designed to fly the yarded logs free of the ground will be planned where it is possible to land the logs in a less critical soil group.</p> <p>Where roads pass through red soil groups, mortality salvage, intermediate and overwood removal cuts will be planned, utilizing cable systems operating from the existing road surface that will, if possible, fly the yarded log to protect soil and silvicultural values. Where limitations of topography prevent flying the yarded</p>

TITLE 8200 - LAND USE PLANNING

Soil Manage-
ment Group

Mapping
Color

Management Direction

log, the logging system employed will be required to continuously keep the leading end of the yarded log free of the ground.

3. The soil sensitivity for all proposed roads and logging planned within this soil management group will be evaluated by the Forest Soil Scientist and his recommendations made available to the District Ranger and Forest Staff. In the event there is disagreement between any of the above on the most appropriate course of action, the Forest Supervisor will make the decision.

Management Directions that apply to all Soil Management Groups are as follows:

1. No tractor logging will be permitted in clear cut units without the specific recommendations of the District Ranger and the Soil Scientist. In the case of conflicting recommendations, the Forest Supervisor will make the decision.

2. Tractor logging will be shut down during wet periods as determined by soil moisture and density factors from proctor curves. This includes rubber-tired skidders as well as tractors.

3. Landings, especially where excavation is required, will be held to the minimum practicable size.

4. Excavated material on slopes over 65 percent which results from landing construction will be end hauled to designated waste areas.

5. Wet weather road construction will not be permitted when the soil moisture condition exceeds that which results in compaction to 90 percent of the maximum density for that particular soil. This will be determined from proctor curves.

6. Road grades will be rolled and alignment sacrificed to avoid, insofar as practicable, all unstable soil areas.

7. Log culverts will not be used. Where drainage facilities are needed in other than permanent roads, temporary log bridges or metal culverts will be installed and left in place after use.

APPENDIX B

TITLE 8200 - LAND USE PLANNING

8200 - POLICY

Streamside Management Units. A Streamside Management Unit (SMU) is part of the water influence zone and will be managed to maintain or improve water quality for the benefit of all water uses (FSM 2542, 2603), to insure that applicable water quality standards will be met, and to comply with the intent of the National Environmental Policy Act.

As part of the multiple use plan, streams of the Siskiyou National Forest have been classified and designated on a map as SMU's. Special management practices will be prescribed on a case-by-case basis to meet goals established for each class of stream, bearing in mind that the cumulative downstream effects from a number of individual streams must also be considered when planning the overall extent and timing of management activities.

The delineation of SMU's will help in designating measures to minimize water temperature increases, reduce turbidity and channel erosion, avoid the accumulation of woody debris, and lessen other impacts on water quality resulting from land management activities.

Where esthetic or recreation values exist or are potentially important, the boundaries of Visual Management System foreground and SMU's may overlap. If management constraints are in conflict, the most restrictive will apply.

The SMU concept recognizes that all streams are important, but that some streams because of their present or foreseeable use should be provided a higher measure of protection than normal watershed management practice would dictate. This is particularly true on the Siskiyou, where in many watersheds, the annual value of sport and commercial fisheries exceeds the annual allowable cut of timber. The net annual value of the fishery resource of the Siskiyou exceeds seven million dollars annually, and in total is derived from both large and small streams. Accordingly, all streams on the Siskiyou deserve a high level of protection.

The SMU concept does not imply arbitrary abstention from all activities near streams but stresses the need for applying special care in management. As a practical matter, however, if SMU management goals are to be met, activity may have to be severely restricted along some streams where the potential for unacceptable impact is high. On the Siskiyou National Forest SMU can be managed with two options: (1) no cut buffers on Class 1 and 2 streams, or (2) partial cut of coniferous trees leaving hardwood to protect streams. Most streams can be managed with the partial cut option.

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In order to remove coniferous trees from SMU and assure that streams will be protected by remaining hardwoods, three C clauses must be used. The C clauses are C2.3#, C6.32, and C6.51. C clause C2.3# allows the use of C6.32, a reserve tree clause, in which values are placed on leave trees. After the value is placed on reserve trees, C6.51 calls for directional falling to protect the reserve trees.

Insuring a desirable level of protection for streams involves more than just the application of the SMU concept, since it is merely one part of properly coordinated land management. For example, ephemeral streams are not delineated in the SMU concept but satisfactory land management practices must still be applied along these streams as well as throughout the watershed.

Definitions

1. Streamside Management Unit

The stream and an adjacent area of varying width where practices that might affect water quality, fish, and other aquatic resources are modified, as necessary, to meet SMU goals for each class of stream.

The width of this area will vary with the management goals for each class of stream, characteristics of the stream and surrounding terrain, and type and extent of the planned activity.

2. Stream. A watercourse or section of a watercourse--

That has perennial flow, or

That has intermittent flow.

3. Perennial Streams

Normally flow yearlong, except during periods of extreme drought.

Have well-defined channels and show signs of washing and scouring.

4. Intermittent Streams

Carry water most of the year, but cease to flow during the dry season because evaporation and percolation into their bed and banks exceeds the available streamflow.

Have well-defined channels. Channels showing active scouring or washing are included in this category even though they may flow only during or immediately after periods of precipitation or the melting of snow.

TITLE 8200 - LAND USE PLANNING

Normally lack litter, except during the fall of the year, indicating stream-flow sufficient to move material during runoff.

Intermittent streams do not include ephemeral streams.

5. Ephemeral Streams

Carry only surface runoff and hence flow only during and immediately after periods of precipitation or the melting of snow.

Form in slight depressions in the natural contour of the ground surface but do not normally develop sufficient flow to wash or scour their channels.

Can usually be identified by the presence of needles or other litter in the depressions.

Recommended Practices. The best land management practices for the individual situation shall be used on all streams on a case by case basis. Examples of desirable practices that will be specified to achieve management goals follow. Additional references are: FSM 2203, 2453.65, 2482.2, 2522.11, and FSH 7709.11, Guides D-4 and D-5, the Environmental Protection Agency "Industrial Waste Guide on Logging Practices" and Oregon State Game Commission "Guidelines for Stream Protection in Logging Operations."

Class 1. The following practices apply:

Timber shall not be felled across the stream, and trees shall be lined, if necessary, to fall away (C6.51). Logs shall not be skidded across the stream and if necessary to cross should be flown clear of the streamside area. SMU's of one to three chains in width will be left on each side of streams. Leave high stumps adjacent to SMU's to prevent movement of woody debris into leave strips and streams. Vegetation which protects streambanks from erosion shall not be disturbed. The amount of shading vegetation required on perennial streams can be estimated using temperature prediction methods. Skyline yarding systems with lateral yarding capability, or helicopters, will be required for timber harvest in SMU's. Logging equipment shall be kept out of streams.

Roads shall be located, constructed, and maintained so that sediment and woody debris will not enter or be deposited in the stream. Utilize bridges or open bottom culverts at stream crossings. Keep equipment out of stream channels except for installation of crossing structures. To insure that effects are minor, no construction activities (bridges, culverts, etc.) will be allowed in the stream between December 1 and March 31, and special installations (e.g., sediment traps, settling ponds, coffer dams, riprap, etc.) should be utilized to keep sediment from reaching streams.

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Man-caused woody debris must not be allowed to enter the stream channel. Removal of existing stable, natural woody debris shall be done only in cases where fish migration is blocked, water quality impaired, excessive erosion is occurring as a result of the debris, or access for recreation purposes is hampered (consult with Forest Fishery Biologist and Watershed Staff). Existing natural woody debris will not be removed in wilderness.

Livestock grazing will be managed under special management prescriptions which fully meet Class I objectives. Allowable use by livestock of streamside vegetation will be limited to the amount that can be utilized while maintaining bank stabilization, water quality, shade, and cover for fish.

Class II. The following practices apply:

Timber shall not be felled across the stream and trees shall be lined, if necessary, to fall away (C6.51). All logs yarded across the stream shall be flown clear of the stream or cross on temporary bridges. SMU's of one to three chains in width will be left on each side of streams. Leave high stumps adjacent to SMU's to prevent movement of woody debris into leave strips and streams. Vegetation which protects streambanks shall be retained. The amount of shading vegetation required on perennial streams can be estimated by using temperature prediction methods. Skyline systems with lateral yarding capability, or helicopters, will be required for timber harvest in SMU's. Logging equipment shall be kept out of streams.

Roads shall be located, constructed, and maintained so that sediment and woody debris will not enter the stream. Crossing structures may be permanent or temporary. Use of equipment in streams shall be allowed only for installation of crossing structures.

A small amount of man-caused woody debris may reach the stream despite the above precautions. It should be removed by hand or by some means that will not disturb the stream channel and streamside vegetation. Removal of existing stable, natural woody debris shall be done only in cases where fish migration is blocked, water quality is being impaired, erosion is occurring or will occur as a result of the debris, or access for recreation purposes is hampered (consult Forest Fishery Biologist and Watershed Staff). Existing natural woody debris will not be removed in wilderness.

Livestock use will be managed under noncontinuous grazing systems (FSM 2222.1) with prescriptions which fully meet Class II objectives. Short term effects of grazing on water quality and fish cover may occur on portions of the stream during a grazing season so long as State and Federal water quality standards are not

TITLE 8200 - LAND USE PLANNING

violated and fish populations are not adversely affected. Any short-term effects should be compensated for during the following grazing season in the grazing system selected.

Class III.

Management practices in this class will be concerned primarily with preventing soil movement, including slumps, earth slides, etc., maintaining satisfactory downstream water temperatures, and keeping debris from moving downstream into higher class streams. Since these are generally perennial streams, care must be taken at all seasons to protect downstream values. The following practices apply:

Timber shall not be felled or skidded across the stream except in rare circumstances. SMU's of one to three chains in width will be left on each side of streams. Vegetation which protects streambanks shall be retained. The amount of shading vegetation required on perennial streams can be estimated by using temperature prediction methods. Skyline systems with lateral yarding capability, or helicopters, will be required for timber harvest in SMU's. Equipment shall not operate in the channel proper.

Roads shall be located, constructed, and maintained so that the streambank and channel are left undisturbed.

Man-caused woody debris that gets into the stream channel shall be removed by hand and/or cable yarding equipment.

Livestock shall be managed in accordance with Class III objectives. Specific criteria covering soil disturbance, shade removal, esthetics, and other values shall be developed for each allotment.

Class IV.

Management practices in this class will be concerned primarily with preventing soil movement, including slumps, earth slides, etc., and debris from moving downstream into higher class streams. Downstream effects are nil during the dry period, but care must be taken to prevent later movement during periods of high precipitation and runoff. The following practices apply:

Felling, skidding, and road construction across streams shall be avoided. When it cannot be reasonably avoided, it shall be conducted at the time of minimum flow and at locations where streambank and channel disturbances are minimized. In some cases buffer strips may be required on Class IV streams to protect the quality of downstream waters.

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Roads shall be located, constructed, and maintained so that the stream channel is left essentially undisturbed.

Man-caused woody debris that gets into the stream channel shall be carefully removed by hand and/or cable yarding equipment.

Grazing will be conducted under principles of livestock management which will protect soil, vegetation, and water quality.

Management Application. The major challenge in proper application of the SMU concept will be on-the-site evaluation of the sensitivity of the specific area in terms of possible damage to water quality and the aquatic resources. This sensitivity will determine the kinds and limits of activity that will meet management goals established for each class of stream. Local guidelines and procedures need to be developed to provide a means of evaluating management alternatives. After acceptable alternatives are identified, the final job will be their proper application.

TITLE 2100 - MULTIPLE USE MANAGEMENT

Stream Class. The present and foreseeable uses made of the water, and the potential effects of on-site changes on downstream uses, are the criteria for defining four stream classes. The importance of use will be relative to the general area. Consequently, size is not necessarily a criterion for classification. Whole streams or parts of streams can be classified. One stream may be sectionalized into several classes.

Class I. Perennial or intermittent streams or segments thereof that have one or more of the following characteristics:

Direct source of water for domestic use (cities, recreation sites, etc.).

Used by large numbers of fish for spawning, rearing or migration.

Flow enough water to have a major influence on water quality of a Class I stream. -*

Class II: Perennial or intermittent streams or segments thereof that have one or both of the following characteristics:

Used by moderate though significant numbers of fish for spawning, rearing or migration.

Flow enough water to have only a moderate and not clearly identifiable influence on downstream quality of a Class I stream, or have a major influence on a Class II stream.

Class III: All other perennial streams or segments thereof not meeting higher class criteria.

Class IV: All other intermittent streams or segments thereof not meeting higher class criteria.

APPENDIX C

The following Oregon Department of Environmental Quality water quality standards will be treated as an overriding objective on this Unit. (it should be noted that these are considerably more stringent than standards currently applicable to either the Elk or Sixes Rivers.) This will mean that no wastes shall be discharged and no activities shall be conducted which either alone or in conjunction with other wastes or activities will cause in the waters of Dry Creek, Elk River, or their main tributaries:

a) "Dissolved Oxygen (D.O.). Dissolved oxygen concentrations to be less than 90 percent of saturation at the seasonal low, or less than 95 percent of saturation in spawning areas during spawning, incubation, hatching, and fry stages of salmonid fishes."

b) "pH (Hydrogen Ion Concentration). pH values to fall outside the range of 7.0 to 8.5."

c) "Turbidity (Jackson Turbidity Units, JTU). Any measurable increases in natural stream turbidities when natural turbidities are less than 30 JTU, or more than a 10 percent cumulative increase in natural stream turbidities when stream turbidities are more than 30 JTU, except for certain short-term activities which may be specifically authorized...and which are necessary to accomodate essential...construction, or other legitimate uses or activities where turbidities in excess of this standard are unavoidable."

d) "Temperature. Any measurable increases when stream temperatures are 58°F. or above, or more than 2°F. increases when stream temperatures are 56°F. or less, except for certain short-term activities which may be specifically authorized...and which are necessary to accomplish legitimate uses or activities where temperatures in excess of this standard are unavoidable."

VISUAL MANAGEMENT SYSTEM - Siskiyou National Forest

Recommended Silvicultural Prescriptions, input to
timber sale preparation.

The following prescriptions, a joint effort of the Districts and Supervisor's Office Silvicultural specialists and the Forest Landscape Architect, are recommended input to all timber sales. It is suggested the pertinent sections be used in EAR reports and guidance to timber sale design and layout. It is not intended that these prescriptions be all inclusive or to stand alone, since they refer only to visual considerations, but are to be considered along with the other functional inventories (e.g. soils, streamsidès, wildlife, etc.)

The degree to which these prescriptions are followed may be determined by the following extract from F.S. Handbook "National Forest Landscape Management, Vol 2" and R-6 Handbook 2380 "The Visual Management System":

ECONOMICS

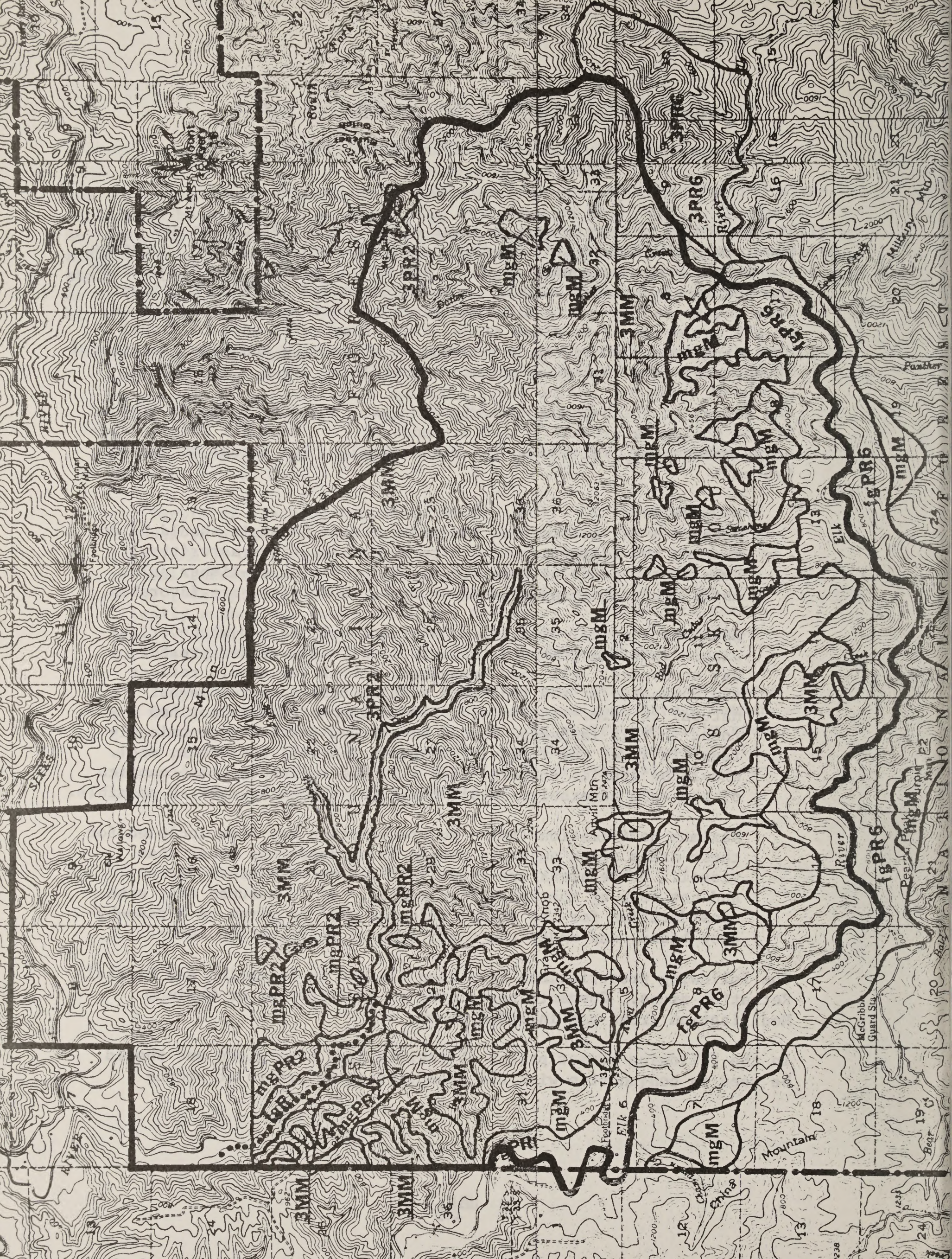
Retention (R) and Partial Retention (PR) - Emphasis should be on meeting the following silvicultural prescriptions as written, even to the point of deferring such activities as timber sales until needed logging systems or market conditions are favorable.

Modification (M) - Quality standards should be met whenever any viable land management alternatives will allow under present day economics. All land management activities should reflect the character of the landscape such as they appear somewhat natural in form. Introducing new dominance factors not now found in this landscape should be avoided wherever economically feasible (i.e. the irregular shapes and sizes, locations, etc. should be applied wherever they will not influence the economics of the sale adversely. Avoid unnatural shapes as much as possible.

Maximum Modification (MM) - No prescription has been included for these areas since emphasis should be on resources other than visual. These areas are usually of common or minimal variety, and not seen by the recreation public. It is assumed that some consideration for the visual resource will be given on a case-by-case basis, and under the conditions of modification above.

The following prescriptions have been limited to Retention and Partial Retention areas. Comments pertaining to Modification or Maximum Modification areas are included above.

In the following prescriptions objectives have been given and should be used in conjunction with the prescription to arrive at proper



visual management input for the timber sale. In each case the makeup of the vegetative cover is considered to enable the presale planner to arrive at the final stand composition. Where Supplemental prescriptions are included, it is intended that they will supersede the basic prescription as per instructions in that supplemental.

FgR1

1. Visual Objectives:

This area is characterized by large, old growth trees, which should influence the size of timber we grow on this site in the future. Because of its other exceptional qualities (e.g. flatness in an area of generally rugged topography, grassy meadows, scenic streamsides, wildlife, etc.) the existing scenery should be maintained in a semblance of its present state.

2. Silvicultural Prescription:

- a. 300 year rotation (for large trees).
- b. Preserve meadows where they now exist, cutting out trees, etc. if necessary.
- c. Regeneration cutting: Stress variety of opening sizes, from 1 to 3 acres. Center activities around patches of salvage. Regenerate through shelterwood where possible, or small (1-3 acre) clearcuts where silviculturally necessary.
- d. Complete disposal of all slash, concentrating efforts along trails, roads, streamsides and around use areas (campgrounds).
- e. Manage for conifer species on site, leaving unique maples, oaks, myrtles, etc. in areas where these are natural, already existing and desirable.
- f. Thin second growth to maintain growth at a rate maximum for this site (to grow as large a tree as possible within this rotation).

FgR2

1. Visual Objectives:

The composition of the foreground in this scenery type is centered around the high, alpine-like vegetation and the way it grows and looks. The unique scenery is composed from large scenic boulders, rock slides, chutes, rock cliffs, all interspersed with alpine-like vegetation (dead tops and limbs, non-uniform, distorted, showing signs of snow and wind stress.) The objective is to maintain this environment and combination of factors.

2. Silvicultural Prescription:

- a. Normal rotation.
- b. Regeneration cutting: True fir type, convert through group selection, managing the entire area. Use conventional equipment where feasible, operating from main road, (no new roads unless absolutely necessary). Commercial thinnings should be made to

model after which to shape harvest units. Emphasize slash disposal and other roadside treatment.

2. Silvicultural Prescription:

- a. Normal rotation.
- b. Regeneration cutting: Irregularly shaped shelterwood cuts, leaving large hardwoods (where possible) as shelterwood trees and/or clearcutting using a great variety of irregular shapes and sizes. Irregular shapes oriented so that no more than 200' of a unit are exposed immediately adjacent to the road. New skid roads and/or temporary roads seeded and closed (obliterated) immediately following the sale. Complete slash disposal within 200' of the road.
- c. Manage for most appropriate conifer species, thinning second growth to maintain normal growth potential for this site. Complete disposal of thinning slash within 200 ft. of roads, trails or use areas.

FgPR5

1. Visual Objectives:

Maintain integrity of the existing vegetative cover (consisting of a variety of stands - hardwood and conifer) i.e. management activities may be visible but the entire area within this prescription should remain pretty much natural. Blend units by brush conversion, simulated meadows, brushfields etc., as the case may be.

2. Silvicultural Prescription:

- a. Normal rotation.
- b. Regeneration cutting: Irregularly shaped shelterwood cuts, leaving large hardwoods (where possible) as shelterwood trees and/or clearcuts using a great variety of irregular shapes and sizes (e.g. from 1 acre to 10 acres). Simulate brushfields, meadows, etc. through use of the regeneration cuts. Landings and roads located so that as much topographic screening as possible is used, relying on this over vegetative screens.
- c. YUM yarding of slash should be used in preference to burning; avoid broadcast burning wherever possible, since this would limit the flexibility of shaping units and irregularity of edges. Burning of piles permissible, complete disposal within 200 ft. of roads, trails or use areas.
- d. Manage for conifer species on site, thinning second growth to maintain maximum growth rate for this area.

FgPR6

1. Visual Objectives:

This foreground area is completely healed and all rock surfaces and cut slopes are vegetated. Stream areas are vegetated with hardwoods which lend brilliant fall color. Management should reflect the stabilized

condition of this landscape and not allow for additional man-caused scars, raw rock or earth surfaces or alterations of stream banks.

2. Silvicultural Prescription:

- a. 200 year rotation (due to extreme site conditions).
- b. Preserve grassy flats or "meadows".
- c. Regeneration cutting: Stress variety of opening sizes generally with none over 10 acres. Center activities around patches of salvage. Convert through shelterwood and/or small clearcuts (with no areas wider than 400 ft.) where silviculturally necessary. Imitation of slide areas and type cutting are suggested techniques.
- d. Pile and dispose of all slash within 200 ft. of road or use areas.
- e. Manage for most appropriate conifer species, leaving unique maples, oaks, myrtles, etc. in areas where these are natural, already existing and desirable.

FgPR7

1. Visual Objectives:

These areas are so sensitive visually, that except for dead and down timber or to check spread of insect epidemics, cutting should be severely limited. These areas are generally unique, highly scenic and possibly politically sensitive. Since these areas are foreground, slash of any type should be completely disposed of.

2. Silvicultural Prescriptions:

- a. No regeneration cutting; no rotation.
- b. Salvage mortality or cut to prevent spread of insect and disease epidemics. Irregular boundaries on small (generally under two acres) clearcuts. Preserve buffers between commercial and non-commercial forest land. Maintain the large conifer trees if possible.
- c. No additional road construction, except on a case-by-case basis where roads may be located so that they are not visible even if screen trees are removed or destroyed. Obliterate any skid roads.
- d. Complete slash cleanup within 200' of roads, trails or use areas.

MgPR1

1. Visual Objectives:

These areas are somewhat high in variety and quite sensitive. Since most of them have natural openings created by rock slides, cliffs, etc., new openings should reflect these in shape, size and placement. There is, in most cases, no reason why new openings cannot be created, but avoid introducing line as a dominance factor (e.g. no new visible roads).

2. Silvicultural Prescription:

- a. Normal rotation.
- b. Regeneration cutting: Regenerate through clearcutting, with random, irregular openings (in placement and size). Maximum width of 150', maximum size of 5 acres. Helicopter log with access by trails not

over 6' wide, suitable for ATV or similar vehicles.

- c. Manage for Douglas-fir, thinning second growth to maintain growth normal for this site. Commercial thinning by helicopter.
- d. Burning of slash and brush permissible (most clearcut openings will be long, linear suggested by the shapes of the slide areas in the immediate vicinity).

3. Supplementals:

- A. Add to 2b: or fly logs free of ground; skyline acceptable where roads will not be an impact (e.g. on ridge lines, etc.).
- B. Add to 2b: or cable logging, one end free of ground where roads can be properly placed (little or none visible) for insignificant impact (delete reference to thinning by helicopter).

MgPR2

1. Visual Objectives.

This scenery is composed of about average variety in most cases and introduction of new and more desirable variety is encouraged (coordinate with Forest Landscape Architect). The objective is to maintain a somewhat natural landscape (i.e. avoid introduction of new dominance factors) while introducing new variety. Avoid roads, landings, etc. except where not visible. Characteristic landscape is composed from mixes of conifers and hardwoods with brush islands, rock slides, etc.

2. Silvicultural Prescriptions:

- a. Normal rotation.
- b. Regeneration cutting: Regenerate through irregularly spaced and sized shelterwoods and/or small (under 5a visible) irregular clearcuts if silviculturally feasible. Leave overstory until reproduction is noticeable (10-15 ft. high). Conventional systems could be used where roads can be properly placed (little or none visible) for insignificant visual impact.
- c. Normal slash and site preparation.
- d. Manage for most appropriate conifer species, thinning second growth to maintain normal growth potential for this site.
- e. Fly logs on thin soils and rock mulch, consider helicopter where additional roading is undesirable, visually or politically (e.g. near Illinois River).

3. Supplemental:

- A. Add under 2b: Convert through shelterwood in normal manner, or small (under 5 acre) clearcuts where silviculturally desirable.
- B. (Delete 2a) Add: 200 year rotation; (delete 2e) add: no ground lead systems.
- C. (Delete 2e) add: no ground lead systems.

severely limited. These areas are generally unique, highly scenic and possibly politically sensitive.

2. Silvicultural Prescription:

- a. No regeneration cutting (no rotation).
- b. Salvage mortality only or cut to prevent spread of insect and disease epidemics. Irregular boundaries on small (generally under two acres) clearcuts. Preserve buffers between commercial and non-commercial forest land. Maintain large conifer trees for texture.
- c. No additional road construction, except on a case-by-case basis where roads may be located so that they are not visible even if screen trees are removed or destroyed. Obliterate any skid roads.

3PR1

This is presently a non-commercial site, due to rocky soil, brushfields etc., and no timber harvest is visualized unless future logging methods make logging of tanoak etc. by extravagant systems (eg. helicopter) possible. Where rocky soil, rock cliffs, slides, etc. characterize the area, preservation of existing variety is most important. This variety balance can be overdone to the point of creating a common or even minimal variety situation. Where brushfields and hardwood stands (with or without meadows) characterize the area, these brushfields create the variety and should be at least mimicked in shape and location with "feathered" edges etc. Conversion of large areas to a conifer type can destroy the variety balance. Meadow areas should be managed as such. Consider burning out or cutting out encroaching brush and/or conifers to keep them open and in the same sizes for maintenance of existing visual balance.

3PR2

1. Visual Objectives:

Maintain the high visual variety composed of brushfields, grassy flats, rocky areas, cliffs, unusual streamside zones, etc., often with scattered large trees of high scenic quality. Maintenance of the existing openings is desirable. Avoid introduction of new dominance factors that overbalance the existing scene.

2. Silvicultural Prescription:

- a. Normal rotation.
- b. Regeneration cutting: Convert through irregularly spaced and sized shelterwoods and/or small (under 5 acre) irregular clearcuts, where silviculturally feasible. Leave overstory until reproduction is noticeable, (10-15 ft. high). Conventional logging where roads can be properly placed for insignificant visual impact (little or no road visible) using helicopter where roads are a major impact. Fly logs on thin soils and rock mulch.

- c. Normal slash and site preparation for this area.
- d. Manage for conifer species on site, thinning second growth to maintain normal growth potential for this site.

3PR3

1. Visual Objectives:

Maintain the high visual variety composed of high, alpine-like scenery with snow chutes, rock slides, cliffs, etc. New openings should mimic existing openings as the existing variety should be preserved. Avoid introduction of new dominance factors that over-balance the existing scene. Avoid creating new roads which may be visible as line on the landscape.

2. Silvicultural Prescription:

- a. Normal rotation.
- b. Regeneration cutting: Convert through clearcutting (these are north slopes in a Douglas-fir type). Design as snow chutes (narrow strips) with random placement and sizes. Helicopter logging with access by trails only. (Trails not wider than sufficient for passage by ATV, 5-6 ft).
- c. Manage for Douglas-fir, thinning second growth (where feasible) to maintain normal growth potential for this area. All commercial thinning by helicopter only.
- d. Broadcast burning of slash and brush permissible where necessary and no other alternative to disposal is available. Avoid visible firelines.

3PR4

1. Visual Objectives:

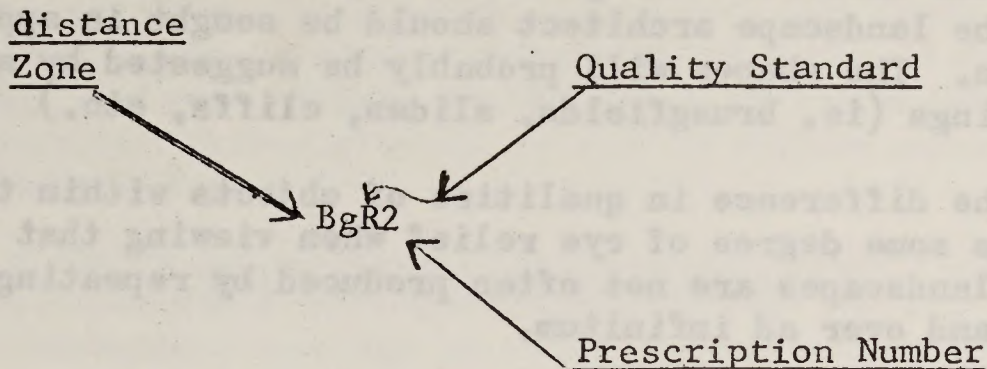
The visual composition of the landscape is scattered trees, often no brush and much bare ground. The ground is such that usually road scars, etc. do not heal and are very visible. There is usually no dominance of line anywhere in this area and introduction of line as a dominance factor should be avoided. Otherwise, manage to maintain the existing variety and scene composition.

2. Silvicultural Prescription:

- a. 200 year rotation (due to toughness of the site).
- b. Regeneration cutting: Cut no tree that does not have satisfactory reproduction already on the immediate site. No intermediate cutting. Helicopter log all areas except when existing roads permit conventional systems.
- c. Log and scatter slash.
- d. Manage for most appropriate species, no thinning or intermediate cutting.

3. Supplemental:

- A. Delete 2a and substitute: 400 year rotation.



distance zone: either foreground (fg), middleground (mg), background (bg), or unseen areas (3).

Quality Standard: a result of distance zone, variety in the landscape, etc. is one of the following: Retention (R), Partial Retention (PR), Modification (M) or Maximum Modification (MM). See R-6 Handbook "The Visual Management System" for implications and detailed descriptions.

Prescription Number: There is no level or priority implied by this number. No prescription is more or less sensitive based upon this number.

Appendix A EXPLANATION OF TERMS

1. Irregular edges, irregular shapes, etc. this is an indefinite term since it means different things to each person. In general, the advice of the landscape architect should be sought in applying this prescription. The shapes will probably be suggested by shapes of nearby openings (ie. brushfields, slides, cliffs, etc.)
2. Variety - the difference in qualities of objects within the landscape that ensures some degree of eye relief when viewing that landscape. Harmonious landscapes are not often produced by repeating a certain shape over and over ad infinitum.
3. Visual impact:
 - a. Natural appearing - this means the created shapes or the part of the activity that is visible is plausible, the shapes and forms can be found in other places, mostly near-by (for example a clearcut can be made "natural appearing" when placed next to a brushfield and some of the original brush in the unit left in place, especially near the natural brushfield. Later on spray may be used overlapping on the brushfield in an irregular way.)
 - b. Naturally established landscape - this term is often used in the objectives and refers to the appearance of the landscape before large scale logging began. It is necessary that the effects of man be included as natural since some of the "best" meadow areas and grassy flats are a result of historic man (homesteading and Indians).
4. Management activity - an activity (or the result of an activity) of man imposed upon the characteristic landscape.
5. Evident - that which is apparant, noticeable, to the casual forest visitor (as opposed to someone trained in the field of forestry)
6. Common - refers to prevalent, usual or widespread landscape variety within a character type. It also refers to ordinary or undistinguished variety.
7. Dominant, dominance factors:
 - a. include form, line, color and texture. They are the visual recognition parts which make up the characteristic landscape.
 - b. potential weight of dominance factors is the ultimate, possible or potential visual strength of each dominant over the broad spectrum of landscapes. It does not refer to the actual weight of specific cases. This relationship between the factors is as follows:

form	strongest
line	↓
color	↓
texture	weakest
8. Quality Standard - a desired level of excellence based on physical and sociological characteristics of an area. Refers to degree of modification of the natural landscape.

9. Sensitive - susceptible to unwanted change, probably do to management activities or results of these activities.

As a condition of timber harvesting, the Forest Service requires that a road be constructed to provide access to the timber. The road must be constructed in such a way as to minimize damage to the forest and to provide for the future use of the road for other purposes. The road must be constructed in such a way as to provide for the future use of the road for other purposes. The road must be constructed in such a way as to provide for the future use of the road for other purposes.

These more complex situations require a more detailed study and analysis. The study must be conducted in such a way as to provide for the future use of the road for other purposes. The study must be conducted in such a way as to provide for the future use of the road for other purposes. The study must be conducted in such a way as to provide for the future use of the road for other purposes.

The study team consisted of:

1. Kjell Bakke, Chairman, District of Columbia, Regional Office
2. Paul Bragdon, Engineer, Mt. Hood N.F.
3. Loren Egan, District Engineer, Mt. Hood N.F.
4. Forest Ranger, District of Columbia, Regional Office
5. Dale Frost, Forest Ranger, Mt. Hood N.F.
6. Charles Hansen, District Ranger, Clackamas R.D., Mt. Hood N.F.
7. Bob McQueen, District Ranger, Elsie R.D., Willamette N.F.
8. Tim Regan, Forest Engineer, Clackamas R.D., Mt. Hood N.F.

In developing a study framework and analyzing the problem, the team quickly concluded that it was necessary to conduct a more detailed study and analysis. The study must be conducted in such a way as to provide for the future use of the road for other purposes. The study must be conducted in such a way as to provide for the future use of the road for other purposes. The study must be conducted in such a way as to provide for the future use of the road for other purposes.

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The recommendations in this report are based on the study and analysis. The study must be conducted in such a way as to provide for the future use of the road for other purposes. The study must be conducted in such a way as to provide for the future use of the road for other purposes. The study must be conducted in such a way as to provide for the future use of the road for other purposes.

We believe that the recommendations presented in this report will provide a way for the future use of the road for other purposes. The study must be conducted in such a way as to provide for the future use of the road for other purposes. The study must be conducted in such a way as to provide for the future use of the road for other purposes.

APPENDIX E

TIMBER PURCHASER

ROAD CONSTRUCTION AUDIT

U.S. FOREST SERVICE

REGION 6

A Study of Roads Designed and Constructed for the Harvest of Timber

January 1973

INTRODUCTION

National concern for a quality environment is at an all-time high. It is expressed in new legislation and by an alert, reactive public. There is an almost universal willingness to accept greater economic burden for the preservation and enjoyment of intangible social benefits associated with a quality environment. No Forest Service program carries with it more potential for the environmental degradation of soil, water, and visual resources than does road building. Further, roads are one of the most lasting and limiting (compromising) actions affecting the area of land-use options available on a given tract of National Forest.

As a condition of timber sale contracts, timber purchasers annually construct over 3,000 miles of roads in Region 6 at a cost in excess of \$50,000,000. The very nature of the progressive timber management program has caused the less problem-oriented roads to be built first. The steeper terrain, more sensitive soils, and often the higher value but more fragile visual and aesthetic resources occur at the higher elevation "back-end" of road development systems. These are the areas in which the predominance of our road building programs will occur.

These more complex resource situations, combined with a new social awareness and sensitivity to environmental quality, require the Forest Service to re-examine past practices and standards. The Regional Forester responded by appointing a special study team to audit timber purchaser road construction practices.

The study team consisted of:

1. Kjell Bakke, Chairman, Division of Engineering, Regional Office
2. Paul Brugato, Engineering, Mt. Hood N.F.
3. Loren Evans, Division of Engineering, Regional Office
4. Forrest Fenstermaker, Division of Operation, Regional Office
5. Dale Frost, Forest Engineer, Wallowa-Whitman N.F.
6. Charles Harden, District Ranger, Clackamas R.D., Mt. Hood N.F.
7. Bob McQuown, District Ranger, Klamath R.D., Winema N.F.
8. Tim Rogan, Forest Engineer, Ochoco N.F.

In developing a study framework and analyzing the problem, the team quickly concluded that it was necessary to audit the entire road program process. The Regional Forester approved an expanded audit which included transportation planning and road design as inseparable and equally pressing elements.

The audit approach was designed to provide a critical review of present practices as a means of achieving improved performance. In no way should this effort be regarded as a lack of recognition for the improvement in purchaser construction that has taken place over the past several years. Ample demonstrations are available throughout the Region to prove otherwise. The 2400-6 Timber Sale Contract and the authorities designated to Engineering Representatives should further aid the positive aspects of the purchaser road program.

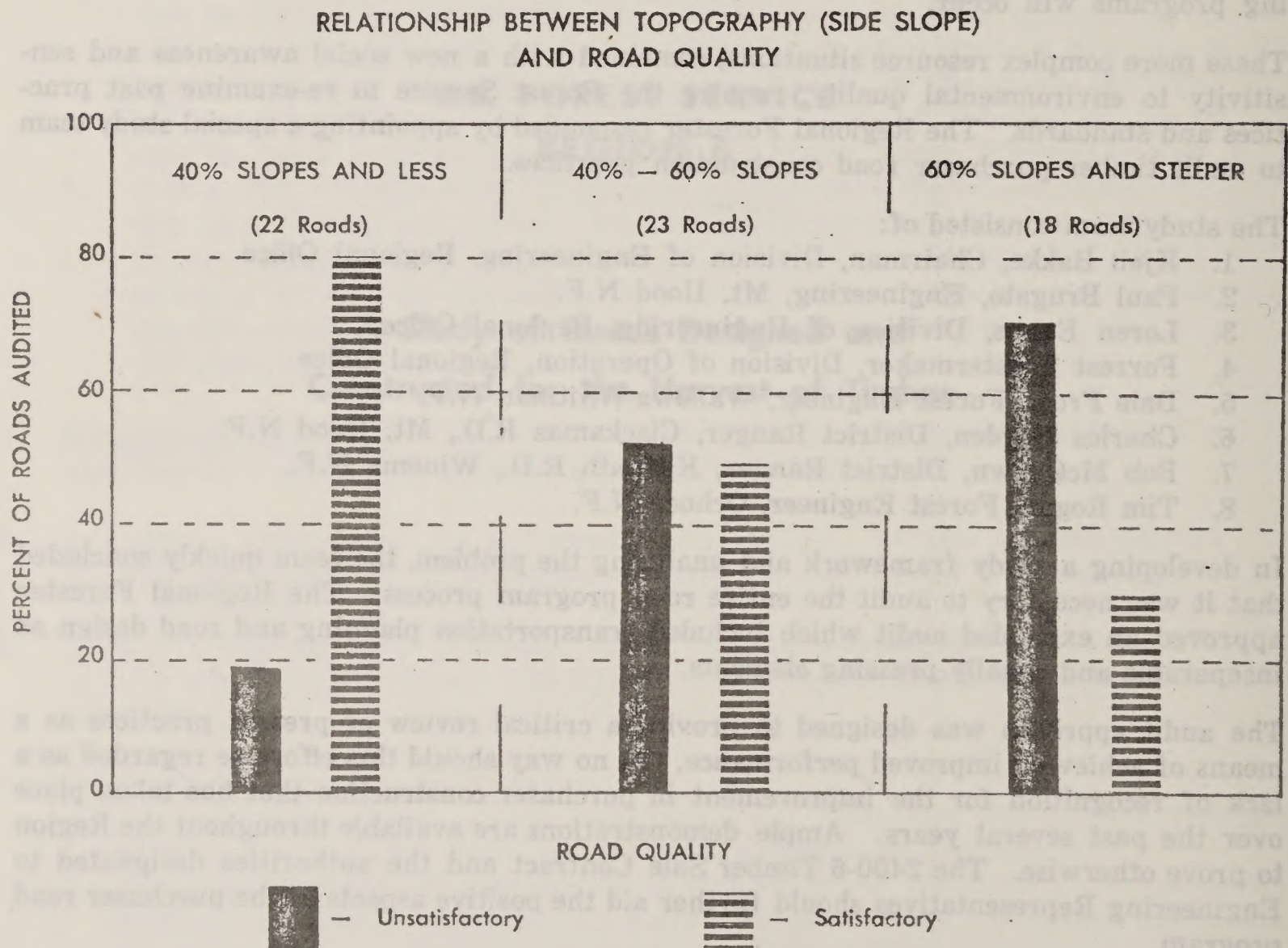
The recommendations in the report are intended to be implemented on all our road projects regardless of the method employed to finance the construction. Therefore, these recommendations apply to timber purchaser, share cost, force account, special use, and public works construction.

We believe that the recommendations presented in this report will pave the way for responsive actions that will achieve an excellent transport system.

PROBLEM ANALYSIS AND RECOMMENDATIONS

1. TOPOGRAPHY AND SOIL STABILITY

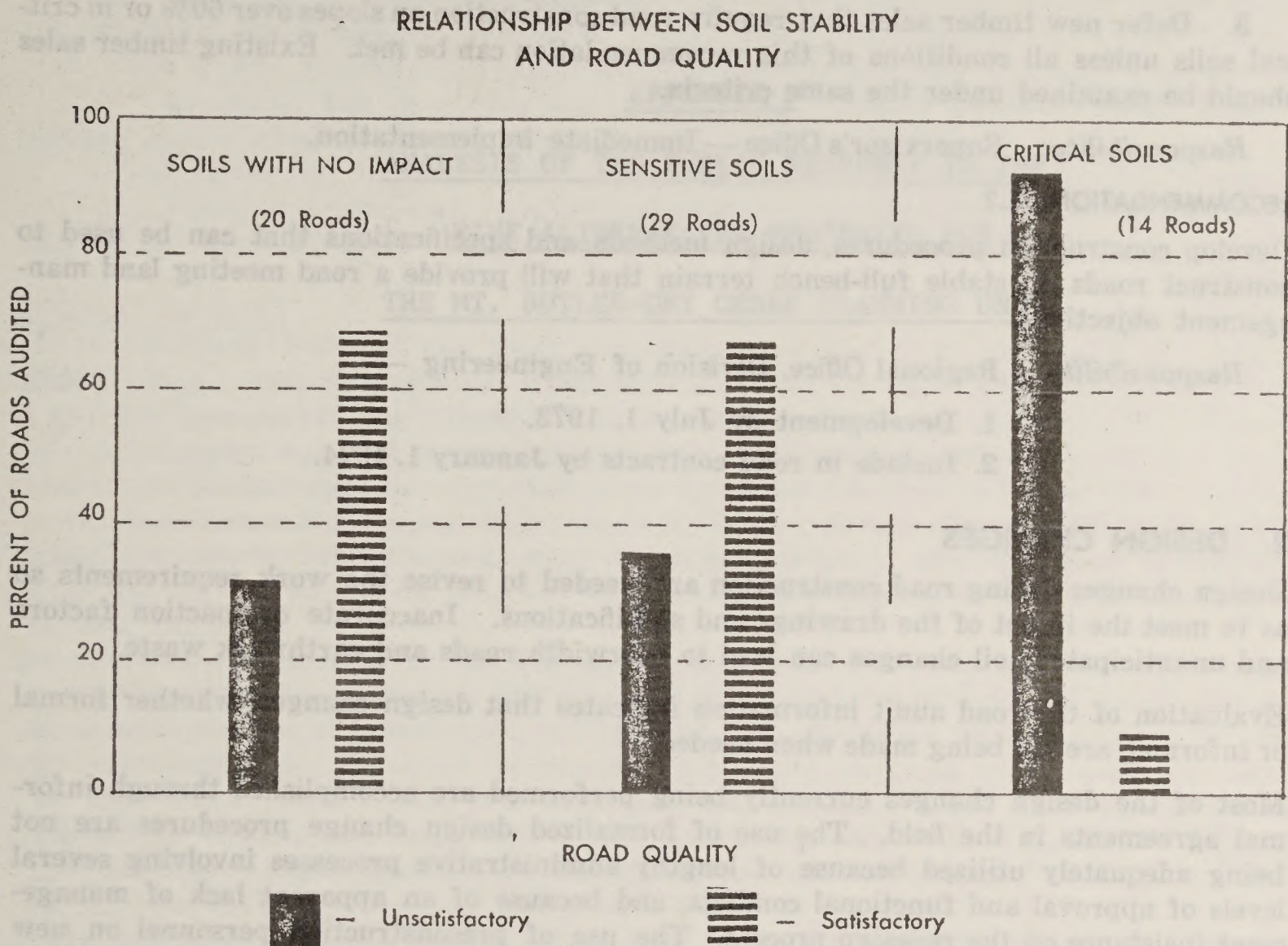
The audit results revealed that road quality was directly related to terrain slopes. As the following chart indicates, steep terrain has an adverse effect on road quality.



The results of construction in steep terrain were found to be independent of soil types, rainfall conditions and locale. The problems of ground slope are identical on the east side and the west side of the Cascades.

Satisfactory projects that were constructed on slopes over 60% involved greater planning efforts, watershed surveys, soil investigations and construction controls.

Soil stability was also found to be directly related to road quality. The following chart indicates the extreme difficulty of attaining a satisfactory road in critical soil conditions. The effects of soil instability are not limited to steep slopes, but can occur in all types of terrain.



RECOMMENDATION 1.1

Road construction on side slopes over 60% or in critical soils should be permitted only when all of the following conditions can be adhered to:

1. Land use planning confirms that a road is absolutely necessary — that there is no other acceptable alternative such as the use of different logging systems, ridgetop roads or other means of transportation.
2. Complete watershed, visual impact and soil surveys are made, supplemented with geotechnical investigations. Identification of all management alternatives and consequences must be provided.
3. Specific road designs, specifications and construction procedures are utilized to manage clearing and excavation during pioneering and subgrade construction to prevent soil loss.

Rigid controls for construction of roads on slopes exceeding 60% will create extreme difficulty in portions of the Region. The available alternatives are:

1. Program timber harvest to more fully utilize the existing road system or construct

new roads on less critical slopes until such time that new logging and hauling systems can be developed and proved, and improved road construction procedures can be initiated.

2. More fully utilize existing but unique logging systems as alternate means of log transport to avoid building a road.

3. Defer new timber sales that require road construction on slopes over 60% or in critical soils unless all conditions of this recommendation can be met. Existing timber sales should be examined under the same criteria.

Responsibility: Supervisor's Office — Immediate implementation.

RECOMMENDATION 1.2

Develop construction procedures, design methods and specifications that can be used to construct roads on stable full-bench terrain that will provide a road meeting land management objectives.

Responsibility: Regional Office, Division of Engineering —

1. Development by July 1, 1973.
2. Include in road contracts by January 1, 1974.

2. DESIGN CHANGES

Design changes during road construction are needed to revise the work requirements so as to meet the intent of the drawings and specifications. Inaccurate compaction factors and unanticipated soil changes can lead to overwidth roads and earthwork waste.

Evaluation of the road audit information indicates that design changes, whether formal or informal, are not being made when needed.

Most of the design changes currently being performed are accomplished through informal agreements in the field. The use of formalized design change procedures are not being adequately utilized because of lengthy administrative processes involving several levels of approval and functional conflicts, and because of an apparent lack of management insistence on the redesign process. The use of preconstruction personnel on new projects rather than on design changes also discourages the use of formal design change procedures. There is also uncertainty on the part of many inspectors as to when design changes can be handled in the field and when formalized design changes are indicated.

RECOMMENDATION 2.1

Preconstruction work efforts must be improved to reduce the need for design changes. However, redesign must also be emphasized as being an integral part of the entire road building process. Design changes must be compatible with original management objectives and constraints. The recurrent need for design changes must be recognized in programming.

Responsibility: Supervisor's Office — Immediate implementation.

RECOMMENDATION 2.2

Design changes that are needed during construction should be given emphasis for the allocation of manpower. Design changes should be done by preconstruction and design personnel. Designs for roads on future programs should be postponed to complete the design changes. Requiring designers to work on the changes will relieve the inspector from this workload and will provide valuable feedback to the designers.

Responsibility: Supervisor's Office — Immediate implementation.

APPENDIX F

ANALYSIS OF THE PUBLIC RESPONSE TO THE FIVE ALTERNATIVES PRESENTED FOR

THE MT. BUTLER-DRY CREEK PLANNING UNIT

BACKGROUND

STATE OF MICHIGAN

Data from the planning unit has been gathered from two multi-disciplinary studies of the area since 1970. The first study was conducted by the Michigan Department of Natural Resources and the Michigan Department of Transportation. The second study was conducted by the Michigan Department of Natural Resources and the Michigan Department of Transportation. The results of these studies are presented in this report. The report is divided into two main sections. The first section, "Background," provides a general overview of the planning unit and the studies conducted. The second section, "Analysis of the Public Response," provides a detailed analysis of the public response to the five alternatives presented for the planning unit. This section is divided into three sub-sections: "Public Response to the Alternatives," "Public Response to the Planning Unit," and "Public Response to the Studies." The "Public Response to the Alternatives" sub-section provides a detailed analysis of the public response to each of the five alternatives. The "Public Response to the Planning Unit" sub-section provides a detailed analysis of the public response to the planning unit as a whole. The "Public Response to the Studies" sub-section provides a detailed analysis of the public response to the two studies conducted. The report concludes with a summary of the findings and a list of recommendations.

I. Receive the data.
The "Public Response to the Alternatives" sub-section provides a detailed analysis of the public response to each of the five alternatives. The "Public Response to the Planning Unit" sub-section provides a detailed analysis of the public response to the planning unit as a whole. The "Public Response to the Studies" sub-section provides a detailed analysis of the public response to the two studies conducted. The report concludes with a summary of the findings and a list of recommendations.

PURPOSE OF THE REPORT

This report is an analysis of the opinion and supporting reasons given by respondents to the brochure detailing five alternate land use proposals for the Mt. Butler-Dry Creek Planning Unit. It has been prepared to serve as an additional piece of information, available to decision-makers who must select a proposed alternative for the Environmental Impact Statement which must be written for the Planning Unit.

This report does not include a decision nor a weighting of opinions and reasons. This is left to the decision-maker(s).

BACKGROUND

Data from the Planning Unit has been gathered from two multi-discipline studies of the area since 1970. An information brochure was distributed to the public on February 11, 1974. About six weeks later, on March 23, 1974, a full-day workshop was held at the Southwestern Oregon Community College campus in Coos Bay. This session was attended by approximately 40 non-Forest Service personnel from widely scattered areas of western Oregon. Information from this workshop was added to existing data to formulate five alternative land use proposals for the Planning Unit.

The five alternatives were distributed to the public in a brochure containing a response form on June 27, 1974. The last of 362 inputs arrived prior to the end of August, 1974. It was decided that a Codinvolve analysis would be required to adequately analyze the large amount of information. The recently-published Codinvolve User's Manual was acquired for use. Also, Lyle Jack of the Winema National Forest was consulted for 1-1/2 days. Mr. Jack is one of the few recognized experts in the northwest on this new analytic tool.

METHOD OF PUBLIC INPUT ANALYSIS

The method used for this analysis is the Codinvolve System for analyzing public input. It was developed in 1972 by Forest Service researchers Roger N. Clark and John C. Hendee of the Pacific Northwest Forest and Range Experiment Station, Seattle, Washington. George H. Stankey, a researcher at the Intermountain Forest and Range Experiment Station in Missoula, Montana, was the third member of the development team.

The Codinvolve System is a method of coding and classifying diverse public inputs with a provision for easy retrieval. The system describes respondent's opinions about a particular issue (in this case the issues of land use alternatives for the Planning Unit) and their reasons for their opinions.

THE SYSTEM INVOLVED SEVERAL STEPS

1. Receive the data.
2. Identify basic questions about the public input for which decision-makers need answers (for example: What was the balance of opinion? What reasons were given? How did opinion vary by residence? Interest group?).
3. Survey the inputs to determine the breath of issues, opinions, and reasons.

4. Develop a codebook and a coding form to guide the coding of subsequent inputs. The coding categories are defined by the content of the input itself, not by what someone might think is in it.

5. Read and code each input as to opinions and supporting reasons. Make reliability checks on coding done.

6. Assemble the opinions and supporting reasons into a set of organized tables which display the content of the public input.

7. Provide technical interpretation of the data as required, avoiding any evaluation of what the data might mean for the decision.

DISPLAY OF DATA

The format to display the data throughout the report shows the number of inputs (I), the number of signatures (S), or both. Since no petitions or the like were received and the type of input was confined to response forms and letters, the numbers of signatures and inputs do not vary greatly. (However, this does not mean that every input had one signature - there were 27 summary cards (8%) that had one I, no S; one I, two S; or the like.) Therefore, the number of signatures (S) was used for the supporting reasons given and for all tables beyond Table V.

Tables I-V give a detailed summary of the opinions and reasons for each of the five alternatives. Table VI summarizes the opinions of all five alternatives in one table.

Table VII breaks the opinions down by the residence of the respondent. "Local" includes Port Orford, Sixes, Gold Beach, Powers, Bandon, Brookings, Myrtle Point, Coquille, and other towns and rural areas within this general area for this analysis. "Other Rural" includes all other places of fewer than 10,000 persons in Oregon except those places within 7 air-miles of the center of cities with 10,000 or more people.

"Urban" includes all cities with 10,000 or more people, including all areas within 7 air-miles of the center of these cities. The sole exception is Grants Pass and its 7-mile radius as respondents from there responded much differently from all other urban areas. Original sorting broke out respondents from Coos Bay (the nearest urban area to the Planning Unit) and from Roseburg, Pendleton, Astoria, Klamath Falls, and Bend (Hypothesized that these were less cosmopolitan and would therefore respond differently from other urban areas). Results showed little difference in either category compared to "urban" areas so the results were combined into a single "urban" category.

The remaining category "Outside Oregon" includes all respondents from outside of the State.

Table VIII breaks the opinions down by "individuals", "public agencies", and "organizations". A "public agency" is any official local, State, or federal government body. An "organization" is any non-government body of citizens, companies, groups, etc.

Table IX separates by the type of input - either response form or personal letter in this case.

Table X separates opinion by the primary interest group given by the respondent on the form or in the letter. Persons known to be in a given category but not giving any such information were placed in the "not given" category with all others not supplying identification. The "conservation" category includes groups primarily interested in the conservation and/or preservation of natural resources. The "fisheries" category includes groups primarily interested in the use and conservation of fisheries resources. The "timber industry" category includes the various mills and associations primarily interested in the utilization of the timber resource. The "self" category includes all respondents listing self, myself, ourselves, etc. The "other" category includes a great many other groups including university faculties, public agencies, organizations, unknown groups, etc.

Table XI summarizes the alternatives suggested by respondents.

Table 1. Public Opinions of Alternative #1

	<u>Inputs</u>	<u>% of Total I</u>	<u>Signatures</u>	<u>% of Total S</u>
Strongly Approve	164	54%	165	54%
Approve	21	7%	20	7%
Disapprove	14	4%	14	5%
Strongly Disapprove	75	25%	74	24%
Modify	31	10%	32	10%
Total	305	100%	305	100%

Reasons Given in Support of the Opinions Expressed:

I. Pro

<u>REASONS</u>	<u># OF SIGNATURES</u>
Valuable fisheries resource protected	72
Protects water quality	44
Almost the entire unit contains unstable, erosive soils, making the area unsuited for much intensive timber management	43
Protects wildlife (especially threatened and endangered species)	22
Don't road or log	21
Protects the soil and the water quality	16
Need more wilderness	16
Minimized environmental damage	15
Too steep for timber management	14
Important fish habitat	11
Unique area for wilderness	9
Protects wilderness values	8
Minimizes man's encroachment	7
Keeps close to natural conditions	6
Protects delicate natural balance	5
Wilderness or roadless recreation best use of the area	4
Fisheries more valuable than timber here	4
Leaves alternatives for the future	4
Allows substantial timber harvest	4
Non-timber values outweigh timber values	3
Defers decision	3
Economically, the best alternative	3
Protects the recreation potential of the area	3
Creates least impact on floral and faunal life systems	2
Protects flora and fauna for future generations	2
Reforestation chances grim	2
Not suitable for timber management	2
Is a delicate, fragile area	2
Is a valuable watershed	2
Water quality is the area's most important resource	2
We must protect what we have left	2

REASONS# OF SIGNATURES

Timber growth slow in area	2
The fisheries are the area's greatest economic asset-logging and roadbuilding could adversely affect them	2
Preserves for future generations	2
Only alternative consistent with Forest Service objectives and good sense	2
Preserves old growth timber	1
Likes to see trees	1
Fisheries and recreation are highest uses of this land	1
Best use for man and animals	1
Preserves steep land	1
Consistent with land use of the Siskiyou National Forest	1
Defacto wilderness this close to ocean in critical short supply	1
Good choice for wilderness	1
Has wilderness potential--is small but <u>wild</u>	1
Deserves serious consideration for wilderness	1
Wilderness study will produce long term benefits	1
Favor wilderness but there are more highly qualified areas on the Siskiyou National Forest	1
Has outstanding opportunities for primitive recreation	1
Retains opportunities for wilderness experience	1
Protects aesthetics of Elk and Sixes Rivers	1
Other areas better suited to timber management	1
Considering everything, value gained by timber harvest is questionable	1
Potential disaster if roaded or logged	1
Less damaging than other alternatives	1
Keeps a clean forest	1
Value of Elk and Sixes Rivers greater than timber value	1
Preserves area where people can go to get their senses restored	1
No primitive-type areas in this part of the Siskiyou	1
Save this last island of wilderness in this area	1
Readily accessible wild area; will receive much future use	1
Protects the resources	1
Powers Ranger District needs a good-sized roadless area	1
Need more study of the unique flora and fauna in the unit	1
Unharvested trees will be worth more later	1
Protects forever rather than relying on ever-changing Forest Service policy	1
Saves area from greedy development	1
Shortsighted; short-term economics	1
Best in the long run	1
Wisest multiple use choice	1
Roading and logging threaten basic productivity of the land	1
No timber development	1
Protects State of Oregon fish hatchery investment	1
Best way to manage fish and wildlife	1
Maintains fragile balance of the Elk River system	1

II. Con

REASONS

OF SIGNATURES

Does not warrent Wilderness classification	4
Timber belongs to the public	4
Not sound multiple use management	3
Timber in short supply	3
Loss of jobs	3
Loss to economy	2
Expanding Wilderness acres not the answer	2
Few will use Wilderness area	2
No roads--does away with family outings	2
Not worth sacrifice of timber, recreation, wildlife, and other resources	1
Precludes timber harvest	1
Do not take good site timber land out of production	1
An inhospitable area for general public use	1
Wilderness is too restrictive for both recreation and timber uses	1
No need for Wilderness	1
Wilderness would lock out common man from rich mineral deposits	1
Does not allow any option in event of natural catastrophe	1
Waste of natural resources	1
Promises nothing but further study while halting logging	1
Wilderness classification too inflexible	1

III. Modifications

REASONS

OF SIGNATURES

Survival Center Modification (see suggested citizen alternatives)	30
Delete A.T.V. trail	5
More protection of water quality is needed	1
Don't road or log	1
Some foot trails are needed	1
Limit hiking trails due to unstable soils	1
Trail system as in Alternative 2 is compatible with Wilderness	1
Close road at headwaters of Dry Creek	1

Table II. Public Opinion of Alternative #2

	<u>Inputs</u>	<u>% of Total I</u>	<u>Signatures</u>	<u>% of Total S</u>
Strongly Approve	60	22%	59	21%
Approve	71	26%	73	26%
Disapprove	37	13%	40	15%
Strongly Disapprove	68	25%	70	25%
Modify	38	14%	37	13%
Total	274	100%	279	100%

Reasons Given in Support of the Opinions Expressed:

I. Pro

<u>REASONS</u>	<u># OF SIGNATURES</u>
Valuable fisheries resource protected	25
Protects the soil and the water quality	16
Protects water quality	13
Almost the entire unit contains unstable, erosive soils, making the area unsuitable for intensive timber management	12
Better than alternatives 3, 4, 5	12
Protects wildlife (especially threatened/endangered species)	7
Develops the recreation potential of the area	6
Allows substantial timber harvest	5
Shouldn't road or log	5
Important fish habitat	3
Only acceptable alternative to wilderness	3
Protects wilderness qualities	3
Minimizes man's encroachment	3
Fisheries are more important than timber	2
Provides flexibility	2
Protects resources	2
Need more wilderness and/or undeveloped areas	2
Minimizes environmental damage	2
Too steep for timber management	2
Protects the flora and fauna for future generations	2
Ecology too delicate to log	2
Better overall land use than alternative 1	2
Emphasizes recreation uses	1
Unit is an important watershed	1
Is an unique area	1
Water quality the most important resource in the area	1
Protects quality of the area	1
Best useage for man, business, and animals	1
Protects flora and fauna	1
Develops maximum primitive recreation potential	1
Best and highest use of the land	1
Fairest to all concerned	1
Non-timber values outweigh timber values	1
Powers Ranger District needs a good trail system away from developed land	1
Reforestation very difficult to obtain in this area	1
Allows time for further study	1
Potentially disastrous if roaded or logged	1
Minimizes road building	1
Need to preserve this fragile landscape	1
Trail system a benefit to recreation users and to fire control	1
I visited the area and believe it merits maximum protection	1
Protects aesthetic values	1
No grave impact to the local economy	1
Protects some of the area	1
Provides a clean forest	1

I. Con

REASONS

OF SIGNATURES

Anvil and Rock Creeks are endangered from logging	9
Too much timber harvest	4
Fisheries resource not adequately protected	4
Don't road or log	3
Loss of jobs	3
Timber in short supply	3
Doesn't recognize potential of area	3
Loss to economy	2
No roads does away with family outings	2
Excessive environmental impact	2
Does not protect life systems, water quality, fisheries, or aesthetics as well as alternative 1	2
Too steep for timber management	2
Timber belongs to the public	1
Oriented to remote hiking	1
Few will use the recreational area	1
Foregoes other values	1
Could realize more timber harvest	1
Don't take good site timber land out of production	1
An inhospitable area for general public use	1
Doesn't warrant a primitive classification	1
Waste of renewable natural resources	1
Scarce recreation funds unlikely to be available	1
Not sound multiple use	1
Timber management and other management activities seriously detract from the wilderness resource	1
Land classification subject to ever-changing Forest Service policy	1
Roadless Recreation administrative classification too vague	1
Too much development	1
Trail system will cause excessive environmental impacts	1
Potentially disastrous to fish, soil, water, and other resources	1
Most of the area contains unstable, erosive soils	1
Excessive erosion	1
Non-timber values outweigh timber values	1
Logging will disturb aesthetic-recreation values	1

III. Modifications

REASONS

OF SIGNATURES

Survival Center modification (see suggested citizen alternatives)	32
Delete some of the trails	5
Delete A.T.V. trail	3
Don't develop Rock and Anvil Creeks	2
No timber harvest	2
Delete trails	2
Close road on ridge at headwaters of Dry Creek	2
Don't road or log	1
Rock and Anvil Creeks need Fisheries/Recreation Areas	1
Prevent timber harvest in Fisheries/Wildlife and Fisheries/Recreation Areas except under very limited conditions	1
Recreation should be low key	1
Keep Fisheries/Recreation and Fisheries/Wildlife Areas roadless	1
Water quality needs greater protection	1

Table III. Public Opinions of Alternate #3

	<u>Inputs</u>	<u>% of Total I</u>	<u>Signatures</u>	<u>% of Total S</u>
Strongly Approve	97	31%	97	30%
Approve	21	7%	21	7%
Disapprove	47	15%	46	14%
Strongly Disapprove	150	47%	156	49%
Modify	1	0%	1	0%
Total	316	100%	321	100%

Reasons Given in Support of the Opinions Expressed:

I. Pro

REASONS

	<u># OF SIGNATURES</u>
Protects jobs	6
Acceptable multiple use	5
Provides continued timber harvest	5
A fair compromise	3
Protects fisheries	3
Better than Alternatives 4 and 5 if extensive timber harvest is necessary	2
Maintains strong raw material base for industry	1
Best compromise between badly needed trails in Coos and Curry Counties and the need for stumpage	1
Buffers on Dry Creek protect the fisheries resource	1
Valuable Elk River fisheries protected	1
Protects streams	1
Some uniqueness to area--preserves some for scientific study	1
Good recreation potential	1
Some good hiking	1
Recreation areas	1
Timber harvest limited to reasonably good sites	1
The best way	1
Should not hamper any possible mining developments	1
Logging done without helicopters (not true)	1

II. Con

REASONS

	<u># OF SIGNATURES</u>
Fisheries resource not adequately protected	43
Almost the entire unit contains unstable, erosive soils	37
Soil and water quality not adequately protected	27
Excessive environmental impact	18
Potentially disastrous to fish, soil, water, and other resources	18
Wildlife (especially threatened/endangered species) not adequately protected	13

REASONS# OF SIGNATURES

Too steep for timber management	10
Don't road and/or log	6
Irreversible negative impacts	5
Fisheries resource value exceeds timber value over the long run	4
Forever eliminates possibilities of wilderness	3
Regeneration will be very difficult to obtain	3
Primitive recreation potential is damaged	3
Inconsistent with Forest Service objectives	3
Buffer zones on Dry Creek are inadequate consideration	3
Shortsighted: short-term economics	3
Primitive recreation not given adequate consideration	2
Too much roading	2
Despoils natural state	2
Too much timber harvest	2
Wilderness is the best use of the land	2
Loss of jobs	2
Not enough roads for family outings	2
Buffer zones larger than necessary	1
Need raw materials	1
Overuse	1
Allows for possible major logging of the area	1
More danger of man-caused fires and destruction	1
Inconsistent with need for unscarred land	1
Destroys possibilities of primitive recreation or wilderness	1
Must leave something for the future	1
We need more primitive and Wilderness areas	1
Potentially disastrous to the environment if logged or roaded	1
Little economic justification	1
Litter	1
Non-timber values outweigh timber values	1
1/8 mile buffers mean practically nothing for aesthetic resources	1
Fragile resources not adequately protected	1
Damages stream environments	1
Don't commit land to intensive timber development until	
National trends are clearer	1
Roads would ruin or upset natural balance	1
Should be managed as roadless	1
Foot trails, and particularly camps, are unnecessary	1
Ridgetop roads wipe out the best trail locations	1
Sacrifices areas to destruction	1
Rape of the area	1
Destructive	1
Leave this sort of rape to the private sector	1
Only good feature is the protected area along Elk River	1
Keep Oregon Green - not muddied by silted streams	1
The fisheries resource is more important than the timber	
resource here	1
Recreation potential not fully realized	1
Economic benefit should be related to current uses, not potentials	1
Loss to economy	1
Don't take good site timber land out of production	1
Doesn't recognize potential	1
Some land uses in alternative are too restrictive	1

III. Modifications

<u>REASONS</u>	<u># OF SIGNATURES</u>
No roading or logging	2
No trails	2
Reduce mileage of foot trail system	1

Table IV. Public Opinions of Alternative #4

	<u>Inputs</u>	<u>% of Total I</u>	<u>Signatures</u>	<u>% of Total S</u>
Strongly Approve	5	2%	5	2%
Approve	13	5%	13	4%
Disapprove	30	11%	30	11%
Strongly Disapprove	227	82%	232	83%
Modify	0	0%	0	0%
Total	275	100%	280	100%

Reasons Given in Support of the Opinions Expressed:

I. Pro

<u>REASONS</u>	<u># OF SIGNATURES</u>
Balanced program	4
Multiple use	3
Economy realizes most resources	2
Fisheries protected	1
Importance of timber to the local economy	1
Best uses starting to be recognized	1
Some uniqueness to area - preserve some for scientific study	1
A fair compromise	1
Good road system	1
Better road system than Alternatives 1, 2, or 3	

II. Con

<u>REASONS</u>	<u># OF SIGNATURES</u>
Fisheries resource not adequately protected	48
Soil and water quality not adequately protected	35
Almost the entire unit contains unstable, erosive soils	31
Excessive environmental impact	21
Potentially disastrous to fish, soil, water and other resources	20
Wildlife (especially threatened and endangered species) not adequately protected	17

REASONS# OF SIGNATURES

Too steep for timber management	11
Irreversible negative impacts	8
Don't road and/or log	7
Too much timber harvest	6
Recreational potential not adequately protected	5
Regeneration will be very difficult to obtain	4
Shortsighted; short-term economics	3
Fisheries resource value exceeds timber value over the long run	3
Too many roads	3
Resources not adequately protected	2
Despoils natural state	2
Destructive	2
Don't build trails	2
Inconsistent with Forest Service objectives	2
Poor land management	1
Primitive-type recreation opportunities at a premium in western Oregon while road-type recreation is a "dime-a-dozen"	1
Must leave something for the future	1
Forever eliminates possibilities of wilderness	1
Doesn't allow enough wilderness atmosphere	1
Need more primitive and wilderness areas	1
Should be managed as roadless	1
Little aesthetic value	1
Don't commit land to intensive development until National trends are clearer	1
Potential disaster if logged or roaded	1
Timber harvest incompatible with 20,000 acres of critical soils	1
Fails to give non-timber values enough consideration	1
Damages stream environments	1
Oxygen value of living trees lost	1
Overuse	1
Little economic justification	1
Litter	1
Only good feature is protected area along the Elk River	1
Keep Oregon Green - not muddied by silted streams	1
Increased risk of wildlife	1
Non-timber values outweigh timber values	1
Timber values over-emphasized	1
A shocking scheme	1
Rape of the area	1
Pro-timber industry	1
Too dollarish	1
Some land classifications are too restrictive	1
Powers Ranger District needs a recreation area to have a balanced multiple use program	1
Don't take good site timber land out of production	1
Loss of jobs	1
Loss to economy	1

Table V. Public Opinions of Alternative #5

	<u>Inputs</u>	<u>% of Total I</u>	<u>Signatures</u>	<u>% of Total S</u>
Strongly Approve	8	3%	7	2%
Approve	3	1%	3	1%
Disapprove	22	8%	21	8%
Strongly Disapprove	242	88%	248	89%
Modify	0	0%	0	0%
Totals	275	100%	279	100%

Reasons Given to Support the Opinions Expressed:

I. Pro

REASONS

OF SIGNATURES

Full utilization of the timber resource 2
 Approve helicopter logging 2
 Recognizes resource values 1
 This is multiple use 1
 Good road system 1
 Only this alternative has good road system and complete forest management 1
 No potential for stream damage 1
 Can still build trails and camps 1
 Not a decision against wilderness forever; Siskiyou has Kalmiopsis Wilderness already 1
 Greatest chance of damage to fisheries will occur without old-growth harvest 1

II. Con

REASONS

OF SIGNATURES

Fisheries resource not adequately protected 45
 Almost the entire unit contains unstable, erosive soils 32
 Soil and water quality not adequately protected 29
 Excessive environmental impact 25
 Potentially disastrous to fish, soil, water, and other resources 20
 Wildlife (especially threatened and endangered species) not adequately protected 15
 Irreversible negative impacts 11
 Too steep for timber management 11
 Shortsighted; short-term economics 7
 Don't road or log 7
 Regeneration will be very difficult to obtain 5

REASONS# OF SIGNATURES

Recreational potential not adequately protected	5
Too much timber harvest	5
Resources not adequately protected	4
Water quality not adequately protected	3
Too many roads	3
Poor land management	2
Fisheries resource value exceeds timber value over the long run	2
Non-timber values outweigh timber values	2
Forever eliminates possibility of wilderness in the area	2
Aesthetic degradation	2
Despoils natural state	2
Must leave something for the future	2
Inconsistent with Forest Service objectives	2
Don't build foot trails	2
Some of the land may be better suited to non-timber uses	1
Little economic justification	1
Pro-timber industry	1
National Forests don't belong to the timber industry	1
Don't commit land to intensive development until national trends are clearer	1
Destroys recreation potential	1
Keep Oregon green - not muddied by silted streams	1
Litter	1
Sacrifices the area to destruction	1
Overuse	1
Timber values over-emphasized	1
Oxygen value of living trees lost	1
Damages stream environments	1
Northern California paid with catastrophic floods for this type of logging	1
Law of diminishing returns at work	1
Totally unacceptable	1
Need more wilderness and primitive areas	1
Should be managed as roadless	1
No comment necessary	1
Timber harvest incompatible with 20,000 acres of critical soils	1
Would destroy future economic base of area: fisheries, recreation	1
Can't sustain a 100-year rotation in the Elk River area	1
Rape of the area	1
Trees grow too slowly to make sustained yield profitable	1
No aesthetic value	1
Too single-use oriented	1
Too dollarish	1
Destructive	1
Potential diaster if roaded or logged	1
Powers Ranger District needs a recreation area to have a balanced multiple use program	1
Loss of jobs	1
Loss to economy	1
Don't take good site timberland out of production.	1

Table VI. Summary of Public Opinions of the Five Alternatives

Alternative	Strongly Approve	Approve	Disapprove	Strongly Disapprove	Modify	Total
1	54%	7%	5%	24%	10%	100%(305)
2	21%	26%	15%	25%	13%	100%(279)
3	30%	7%	14%	49%	0%	100%(321)
4	2%	4%	11%	83%	0%	100%(280)
5	2%	1%	8%	89%	0%	100%(279)
Total	-	-	-	-	-	100%(1464)

Table VII. Public Opinions of the Five Alternatives by Residence

Alternative	Local		Other Rural		Grants Pass		Urban		Outside Oregon	
	S	%	S	%	S	%	S	%	S	%
A-1: Favor	10	36%	18	64%	5	8%	143	80%	8	100%
Oppose	18	64%	4	14%	56	92%	10	6%	0	0%
Modify	0	0%	6	22%	0	0%	26	14%	0	0%
A-2: Favor	9	33%	16	57%	3	5%	96	62%	7	88%
Oppose	18	67%	8	29%	54	95%	27	17%	1	12%
Modify	0	0%	4	14%	0	0%	33	21%	0	0%
A-3: Favor	33	58%	3	11%	72	94%	10	6%	0	0%
Oppose	14	42%	24	89%	5	6%	151	93%	8	100%
Modify	0	0%	0	0%	0	0%	1	1%	0	0%
A-4: Favor	13	46%	0	0%	0	0%	5	3%	0	0%
Oppose	15	54%	26	100%	60	100%	153	97%	8	100%
Modify	0	0%	0	0%	0	0%	0	0%	0	0%
A-5: Favor	7	26%	0	0%	0	0%	3	2%	0	0%
Oppose	20	74%	25	100%	61	100%	155	98%	8	100%
Modify	0	0%	0	0%	0	0%	0	0%	0	0%

Table VIII. Public Opinions of the Five Alternatives by Who Responded

<u>Alternative</u>	<u>Individuals</u>		<u>Public Agencies</u>		<u>Organizations</u>	
	<u>S</u>	<u>%</u>	<u>S</u>	<u>%</u>	<u>S</u>	<u>%</u>
A-1: Favor	182	61%	1	33%	2	67%
Oppose	86	29%	2	67%	0	0%
Modify	31	10%	0		1	33%
A-2: Favor	128	48%	3	60%	0	0%
Oppose	103	38%	1	20%	1	100%
Modify	37	14%	1	20%	0	0%
A-3: Favor	116	37%	2	50%	0	0%
Oppose	199	63%	2	50%	1	100%
Modify	1	0%	0	0%	0	0%
A-4: Favor	17	6%	1	33%	0	0%
Oppose	259	94%	2	67%	1	100%
Modify	0	0%	0	0%	0	0%
A-5: Favor	8	3%	1	33%	1	50%
Oppose	266	97%	2	67%	1	50%
Modify	0	0%	0	0%	0	0%

Public Agencies:

City of Coquille: Favor 4
Curry Soil and Water Conservation Board: Favor 3, 5; Oppose 1, 2.
Fish Commission of Oregon: Modify 2; Oppose 3, 4, 5.
Wildlife Commission of Oregon: Favor 2.
Oregon State Parks and Recreation: Favor 2; Oppose 1, 3, 4, 5.
Oregon State Water Resources Board: No preferences specifically listed.
Pacific Northwest River Basins Commission: Favor 1, 2, 3.

Organizations

Outdoor Program, University of Oregon: Modify 1
Powers Chamber of Commerce: No preferences specifically listed.
Survival Center, University of Oregon: Favor 1; Oppose 2, 3, 4, 5.
Western Forest Industrial Association: Favor 5.
Wilderness Society: Favor 1

Table IX. Public Opinion of the Five Alternatives by the Type of Input

<u>Alternative</u>	<u>Personal Letter</u>		<u>Response Form</u>	
	<u>S</u>	<u>%</u>	<u>S</u>	<u>%</u>
A-1: Favor	8	73%	179	60%
Oppose	2	18%	87	29%
Modify	1	9%	31	11%
A-2: Favor	4	44%	130	48%
Oppose	4	44%	107	39%
Modify	1	12%	36	13%
A-3: Favor	1	14%	117	37%
Oppose	7	86%	195	62%
Modify	0	0%	1	1%
A-4: Favor	0	0%	18	7%
Oppose	7	100%	258	93%
Modify	0	0%	0	0%
A-5: Favor	2	25%	10	4%
Oppose	6	75%	265	96%
Modify	0	0%	0	0%

Table X. Public Opinions of the Five Alternatives by Primary Interest Group

Alternative	Conservation		Fisheries		Timber Ind.		Other		Self		Not Given	
	S	%	S	%	S	%	S	%	S	%	S	%
A-1: Favor	56	80%	23	92%	0	0%	35	76%	19	59%	52	50%
Oppose	1	1%	0	0%	28	100%	6	13%	7	22%	46	44%
Modify	13	19%	2	8%	0	0%	5	11%	6	19%	6	6%
A-2: Favor	37	66%	13	72%	2	7%	32	67%	9	30%	39	40%
Oppose	8	14%	5	28%	26	93%	8	17%	11	37%	50	52%
Modify	11	20%	0	0%	0	0%	8	16%	10	33%	8	8%
A-3: Favor	1	2%	0	0%	41	91%	6	13%	7	21%	63	53%
Oppose	57	98%	22	100%	4	9%	38	84%	26	79%	55	47%
Modify	0	0%	0	0%	0	0%	1	3%	0	0%	0	0%
A-4: Favor	1	2%	0	0%	4	14%	4	9%	2	7%	7	7%
Oppose	58	98%	22	100%	24	86%	39	91%	28	93%	91	93%
Modify	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
A-5: Favor	0	0%	0	0%	4	14%	1	2%	2	7%	3	3%
Oppose	58	100%	22	100%	25	86%	42	98%	28	93%	94	97%
Modify	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%

Table XI. Summary of Suggested Citizen Alternatives

1. Survival Center Modification of Alternative 1: This modification would designate wilderness study for the entire Unit except the Butler Creek drainage. It would put the road in the headwaters of Dry Creek (road to section 36) to bed and would not build a road out that ridgetop. The Fisheries/Wildlife Area would be managed as roadless. The A.T.V. trail would be deleted. Timber management in Butler Creek would include stream buffers, light impact harvest methods, and restoration of cutover and eroded lands. Access would be from the south.
2. Survival Center Modification of Alternative 2: This modification would designate either wilderness study or roadless recreation status to the entire Unit except for the Butler Creek drainage. The road at the headwaters of Dry Creek (road to section 36) would be put to bed. No road would be built out that ridgetop. The Fisheries/Wildlife Area would be managed as roadless. The A.T.V. trail would be deleted. A less extensive, moderate impact foot trail system would not include a trail along Dry Creek. Timber management in Butler Creek would include stream buffers, light impact harvest methods, and restoration of cutover and eroded lands. Access would be from the south.
3. Robert L. Benson Alternative: Wilderness status for most of Dry Creek drainage and Grassy Knob-Anvil Mountain ridge (estimate 9,000 acres of 12,000-acre roadless area B-11). Fisheries/Recreation Area extending well back from Elk River (estimate 7,500 acres). Roadless area immediately east of inventoried roadless area B-11(including sections 25 and 36 with 2,000 acre estimate) with some aerial logging allowed. Road to section 36 would be put to bed, A.T.V. trail would not be built, and a few minimum impact trails constructed. Carefully controlled logging with reasonable stream protection would be allowed in extreme western end of Unit and most of Butler Creek drainage (estimate 3,600 acres).
4. Peter Chase Alternative; This alternative is essentially the same as Alternative 3, but would allow greater flexibility in use categories.
5. Katy Flanagan Alternative: This alternative would classify the entire Unit wilderness with already-developed-areas restored.
6. Rod Greene Alternative: This alternative would have a Fisheries/Recreation Area extended up Dry Creek to the junction of the North Fork. A trail system would extend along Dry Creek and up through the drainage to roads on the ridgetop. Good sound forest management would be practiced on the rest of the Unit. Some areas might not be harvested at all. The trails would pass through all stages of stand development to provide method of educating the public.
7. Holway Jones Alternative: This alternative would include Rock and Anvil Creek drainages and the entire Dry Creek drainage in the Roadless Recreation Area. The Dry Creek drainage above the intersection of the North Fork would be trail-less and left for cross country travel. Construct a new access trail along Anvil Creek to connect with the Elk River Road. Consider one or two additional loop trails in the lower Dry Creek drainage as well as additional miles in the Fisheries/Wildlife Area.

8. B. J. Mayo Alternative: This alternative would designate the entire inventoried roadless area B-11 and all other lands west of section 36 and south of sections 7 and 8 (T. 33 S., R. 13 W.) as roadless recreation and wildlife management areas. Trail development would be in steps and wilderness designation considered.

9. George R. Shook Alternative: This alternative would be similar to Alternative 2 except neither Anvil nor Rock Creeks would be developed immediately as in Alternative 2. This area (estimate 17,000 acres) would be left undeveloped for a specified period of time (10, 15, or 20 years). This deferral of the decision would allow currently transitional national values to crystallize. The Butler Creek drainage would continue to be developed.

10. Fred J. Swanson Alternative: This alternative would include the entire Dry Creek drainage and Elk River drainage (with the exception of the Butler Creek drainage) in an area managed primarily for the fisheries resource. Logging would be prohibited. Timber management with stream protection would be allowed in the Butler Creek drainage.

11. Unidentified Person Alternative: This alternative would classify the entire area wilderness with already-developed areas restored.

APPENDIX G

SUMMARY OF THE PUBLIC RESPONSE TO THE DRAFT ENVIRONMENTAL STATEMENT 1/

	A-1		A-2		A-3		A-4		A-5		A-6		Other	
	I	S	I	S	I	S	I	S	I	S	I	S	I	S
Who:														
Individual	26	33	16	41	898	941	3	3	58	59	0	0	22	45
Public Agency	1	1	3	3	6	10	0	0	0	0	0	0	4	4
Private Organization	3	3	0	0	14	30	0	0	0	0	0	0	4	4
	30	37	19	44	918	981	3	3	58	59	0	0	30	53
Residence:														
Local	15	21	14	39	709	737	1	1	1	2	0	0	13	35
Other Rural	3	4	0	0	23	23	0	0	9	9	0	0	0	0
Urban	4	4	3	3	14	14	0	0	0	0	0	0	7	7
Coos Bay	6	6	1	1	29	65	1	1	0	0	0	0	4	4
Grants Pass	0	0	0	0	33	33	1	1	47	47	0	0	1	1
Outside Oregon	2	2	0	0	16	16	0	0	0	0	0	0	5	6
Unknown	0	0	1	1	94	93	0	0	1	1	0	0	0	0
	30	37	19	44	918	981	3	3	58	59	0	0	30	53
Form:														
Personal Letter	30	37	18	18	91	95	3	3	2	3	0	0	29	33
Form Letter	0	0	0	0	6	833	0	0	1	56	0	0	0	0
Petition	0	0	1	26	2	53	0	0	0	0	0	0	1	20
	30	37	19	44	99	981	3	3	3	59	0	0	30	53

1/ I = number of inputs; S = number of signatures

APPENDIX H

COMMENTS RECEIVED ON THE

DRAFT ENVIRONMENTAL STATEMENT

APPENDIX C

TO THE DEPT. OF ENVIRONMENTAL PROTECTION
SUMMARY OF THE PUBLIC RESPONSE

Letter No. 1

U.S. ENVIRONMENTAL PROTECTION AGENCY

REGION X

1200 SIXTH AVENUE
SEATTLE, WASHINGTON 98101



REPLY TO
ATTN OF:

10FA - M/S 623

May 12, 1975

Mr. W. P. Ronayne
Forest Supervisor
U.S.D.A. - Forest Service
Siskiyou National Forest
P. O. Box 440
Grants Pass, Oregon 97526

Dear Mr. Ronayne:

We have completed review of your draft environmental impact statement, "Mt. Butler-Dry Creek Planning Unit in Curry County, Oregon, Siskiyou National Forest."

Our review comments are primarily focused on water quality and are, therefore somewhat one dimensional. However, we do have a few general observations about the total statement.

General Comments

1. The basic decision--as in most (if not all) of these roadless area statements--is to do something, roads, harvest, campgrounds, or nothing (wilderness, back country, etc.) with roadless areas.
2. Assuming one agrees with the basic decision, it appears the mix of allocations (timber harvest, fisheries/recreation and fisheries/wildlife) is a pretty good balance (and even includes some quasi-wilderness in the F/W portion).

One aspect of the allocation process is not clear. On pages 40-41, timber harvest remains an option in the Fisheries/Recreation and the Fisheries/Wildlife areas where it is "compatible with the primary objectives." What are the primary objectives? From one standpoint, as now written, this could mean the door is open to timber harvest at some unspecified rate. Interpreted another way, it could mean only incidental, sporadic, highly restricted removal. This harvest "option" needs more elaboration and clarification.

3. The discussion of potential impacts appears to be rather complete for the plant, visual, and portions of the animal systems (fisheries, game animals, threatened species). The last sentence, second paragraph,

Info	✓
Action	✓
Distrib. D	✓
Supv.	✓
T. M.	✓
A. O.	✓
Land	✓
Engr.	✓
Fire	✓
Wildl.	✓
SISKIYOU	
MAY 14 1975	
B & F	
Personl	
Resrc	
Ad. Serv.	
Cont'g	
Purch'g	
Zone I	
Zone II	
5/15/75	encl

2

page 36, indicates that an intensive wildlife survey would be useful to complete the information base for this sphere. It would appear that this would be a desirable objective or accomplishment task for the unit.

4. Alternative #6 seems like a slanted approach. No action to us means no activities on the land. An alternative of maintaining the status quo (no change on the land) could include some kind of plan as to how this would be done, data needed, etc.

Water Quality Management

Our evaluation is based on the following elements of water quality management program:

- a. Description of water quality goals/objectives
- b. Inventory of important factors
- c. Identification of important problems
- d. Identification of BPT (best preventative techniques)
- e. Identification of mechanisms available/needed to solve problems
- f. Short and long-range accomplishment plans
- g. Critique

The water quality degradation potential is well-summarized by the following statements:

"virtually all of...the unit...characterized as very steep, rugged terrain." (Page 3)

"The potential for serious damage to fisheries, soil, water... must be considered very high." (Page 3)

"...90% of the soils...in the unit...are classified as "critical soils" (Page 13).

Therefore, we believe the statement should contain as clear a description as feasible of ways and means by which water quality management goals will be accomplished. Recognizing the need for site-specific tailoring of techniques, etc., a listing of every possible specification would not be appropriate. However, a listing of the important management techniques would be in order. Basically, we feel that this has been accomplished in the document. The items and questions in the following discussion are suggestions for improving the clarity and coverage.

a. Water quality goals

1. Seem quite complete and includes some quantification (turbidity and temperature standards).

b. Inventory

Inventory information presented is comprehensive--soils,

geology, terrain, climate, runoff pattern, streamflow data, vegetative condition and stream classification.

To provide a better grasp of the situation, two items would be very useful to the reviewer:

- (1) Show the stream classifications on a map;
- (2) Tie the soils information in the report text to the soils policy description in the appendix. This could be done either with a soils map or a tabulation of acreages by soil management group.

The reason these are important is because many of the specific prescriptions are tied to the stream class and the soil management group.

c. Identification of important problems

This is rather complete.

d. Best Available Practices

A number of management (impact prevention/minimizing) practices, methods and procedures are described in the text and the appendix (e.g., ridgetop roads, skyline and helicopter logging, no slash burning, directional felling, end hauling, etc.).

However, we have questions and suggestions on these items

- (1) See b. (2) above
- (2) Page 15, what does "high" road standard mean? If this means two-lane superhighways, then we suggest this is a potential problem. The term "high standard" should be explained.
- (3) Roads are identified as a major impact causing agent. Pages 21 and 23 mention "sophisticated road construction." Specific prevention/minimizing techniques are mentioned in various places--e.g., ridgetop roads, limiting the amount of road (30 miles)--primarily through logging systems--end haul, rolling grade, no construction, geo-technical, "high standard"? etc. Does the aggregate of the items mentioned equal "sophisticated"? If so, it might be clearer to add a statement to the effect that "sophisticated" means using the best available practices for road planning, design, construction and maintenance as described in sections ___, appendices ___, etc.

- (4) Pages 21 and 23 also discuss sophisticated timber harvest and logging. The same thoughts as in (3) above apply here.

Discussion on page 23 and especially on pages 33-34--infers that the amount of area cut over is important to moderate streamflow peaks. Page 23 talks about timber harvest at a "conservative" rate. Page 42 indicates that gradual harvest is in terms of volume removed rather than acreage cut over. Page 34 describes a practice of dispersing harvest units over the unit in time and space. Page 42 indicates an average of 1,230 acres harvested during a 10-year span; but apparently this could vary from 750 to 4,500 acres. It would appear that if the acreage treated over time is important, some upper acreage ceiling for any five or 10-year period would be in order.

e. Mechanisms

Several mechanisms for achieving water quality control are mentioned or alluded to--timber sale contracts, appropriated funds contracts, policies, (streamside, soils, road audit), state water quality standards, unit water quality standards and constraints (e.g., Page 33 policy control directives which have overriding influence).

It appears that the tools are available (except perhaps for appropriated funds) to control activities. What is not clear is to what degree the "constraints" (e.g., water quality standards, SMU policy, soils) are to be overriding. Does this mean if they are violated, activities will cease? What are the kinds of actions which will be taken when constraints are exceeded?

Another question is what are the consequences if appropriated funds for roads are not received? Proceed as best as can be done? Wait? What is the alternative?

f. Plans

Presumably this EIS is an exposition of the unit plan. Although water quality management plans are not a separate entity (and it appears an integrated single plan is superior), water quality management planning is quite evident throughout.

9. Critique

General items of ongoing critique mentioned are water quality monitoring, quality control for access road construction and plan re-evaluation in 5 to 10 years (page 37).

(1) Page 34 mentioned that Dry Creek and Elk River will be monitored. It is difficult to evaluate the effectiveness of this effort without knowing a little more about where monitoring will occur (perhaps on a map) and a brief description of the monitoring approach (long-term, short-term, year long, periodic, timed to activity level, etc.).

(2) Quality control--what does this mean? What are some examples of quality control devices to be used? Full-time, certified resident engineer?

(3) With the stated critical nature of the unit, it would appear that some form of audit or evaluation would be in order before "5 to 10 years"--particularly during the first 5-year period.

Our comments on this draft statement have been classified LO-1, LO (Lack of Objections) 1 (Adequate Information). The classification of the Environmental Protection Agency's comments will be published in the Federal Register in accordance with our responsibility to inform the public of our review on proposed Federal actions under Section 309 of the Clean Air Act.

Thank you for the opportunity to comment on this draft environmental impact statement.

Sincerely yours,

Walter D. Jaspers

Walter D. Jaspers
Director
Office of Federal Affairs



Letter No. 2

United States Department of the Interior

OFFICE OF THE SECRETARY
PACIFIC NORTHWEST REGION
P.O. Box 3621, Portland, Oregon 97208

May 21, 1975

ER-75/339

Mr. William P. Ronayne,
Forest Supervisor
Siskiyou National Forest
P. O. Box 440
Grants Pass, Oregon 97526

Dear Mr. Ronayne:

We have reviewed the draft Environmental Impact Statement for the Land Use Plan of the Mt. Butler-Dry Creek Planning Unit, Siskiyou National Forest, Oregon. The following comments are offered for your consideration when preparing the final statement.

General Comment

None of the map segments show townships or range; therefore, specific location of the planning unit is difficult to determine without local knowledge of stream and mountain names. Maps without township and range identification are on pages 5, 14, 39, 54, 58, 62, 66, 70, and 96. It is true that the narrative (page 2) does identify the township and range limits, but it would certainly strengthen the statement if the maps themselves carried this information as maps normally do. Also the statement makes reference to specific sections in certain townships and ranges (pp. 15, 21, 25, and 31, to name a few) which are not locatable without proper map identification.

A transportation map showing all roads would be useful. Such a map should extend westward at least to the Oregon Coast Highway from Sixes to Humbug Mountain. This map will better relate the unit to the "outside world". Also the statement makes references to specific Forest Service road numbers (pp. 9 and 27, to name two instances) without identifying them on the maps. A transportation map could easily portray such identification numbers.

Info	✓
Action	✓
Supv.	✓
T. U.	✓
A. O.	✓
Land	✓
Engr.	✓
File	✓
Mail	✓
Stamp	✓
May 22 1975	
8 & F	
Period	
Return	
Ad. S. S.	
C. S. S.	
Public	
Zone I	
Zone II	

The Geological Survey has studied two powersites that would affect portions of the planning unit along its northern and southern boundaries. The Beaver Creek site, also called the Sixes site, located outside the planning unit boundary, would utilize a 140-foot high dam to an altitude of 160 feet in sec. 10, T. 32 S., R. 15 W., to store 113,000 acre-feet of water on the Sixes River. Water would be backed ten miles upstream through portions of secs. 8 and 9, T. 32 S., R. 14 W., inside the planning unit boundary. The Sixes damsite was surveyed in 1959. The Slate Creek site, located on the Elk River, would develop 500 feet of gross head with a 200-foot high dam in sec. 23, T. 33 S., R. 14 W., and a four-mile long conduit to a powerhouse in sec. 7 of the same township. Power development at the two powersites would total about 17MW, equivalent to the energy available in 158,000 barrels of oil annually.

No plans are known to be under active consideration for hydroelectric development in the planning unit area and no lands have been classified for such development. The Columbia-North Comprehensive Framework Study, Appendix XVI (1972), recommended that the Sixes and Elk Rivers be studied for preservation in their free flowing state, which could preclude power development.

Specific Comment

Page iii, paragraph VI - The five alternatives to the proposed action are each given a thumb-nail summary. It would be helpful to have the proposed action also explained along with the other alternatives in a comparable manner.

Page 1, General Summary - The Multiple Use concept of land management requires careful consideration of all the resource values involved and provision for balanced resource development. The Land Use Plan in its opening summary makes no mention at all of minerals management, and thus deviates from the Multiple Use concept.

Page 9, History & Archeology, paragraphs 3, 4, and 5 - The assertion that the inventories and evaluation of cultural resources mandated by Executive Order 11593 have been completed, should be more fully documented. If professionally conducted historical/archeological surveys were conducted, they should be cited. If existing survey records were consulted, this should be cited. We should point out in this regard that mere consultation with existing records is rarely adequate. In most cases, the areas involved will not have been surveyed.

Pages 12-13, Geology & Soils - The section on geology should relate geology to existing or potential mineral resources. Available information on past and present mining activities, mineral exploration, and mineralization should be obtained and documented in the bibliography.

Page 13, Geology & Soils, paragraph 2 - The following statement is too general: "Therefore, a ridgetop road system would tend to avoid the most critical soils. This will tend to minimize accelerated soil erosion and keep existing roads in place." Although the exact location of the 34 miles of roads is not pointed out (if the entire system will be on a ridgetop system and therefore located on the 10% terrain that is moderately stable) the impacts of such construction could be serious, especially in light of the opening statement under Geology and Soils, (p. 12): "Landforms in this unit are typically steep and highly dissected. Slopes average about 80% but slopes exceeding 100% and rock bluffs are common. Slopes are convex in shape but ridgetops are typically razorback." Razorback ridgetops are normally quite narrow. Suitable waste sites for excess materials are scarce. Sidecast is likely to be a serious problem. In light of the admittedly rich aquatic resources of the Elk and Sixes rivers and unstable geology, we believe a detailed analysis of the impacts of roading is warranted.

Page 15, Fisheries, paragraphs 3 & 4, and Page 93B, Stream Class - The proper classification of streams is extremely important when considering subsequent timber harvest practices and their effects on fish habitat. The protection of productive streams under Classes I and II excludes upper reaches of numerous small tributaries utilized by fish for spawning or rearing. The total contribution of these smaller streams to the overall fish population could be significant and worthy of protection. Considering the soil instability of the steep terrain within the planning unit and the subsequent high risk of erosion, buffer strips of maximum possible width should be preserved along streams.

Page 25, Minerals - The draft statement merely gives passing attention to known or potential mineral resources in the planning unit. The statement is basically correct; however, in stating that there has been significant gold production in the general area but that no substantial mineral resource is known to exist in the planning unit even though many mining claims lie within its boundaries, does not mean that significant deposits do not exist. Precious locatable minerals are probably present in relatively small quantities but their quantitative presence has just not been thoroughly assessed.

The subject area is primarily in the Klamath Mountain-Siskiyou Mountain physiographic, geologic province. The complex geology of the Klamath Mountains provide a favorable environment for mineral deposits. Access into the area is or has been very difficult. This, plus the heavy overgrowth, has discouraged mineral exploration in the area. The entire Klamath-Siskiyou province is dotted with mineral occurrences including gold, copper, nickel, iron, chromite, ilmenite, magnetite, platinum, marble, silica, talc, soapstone, barite, asbestos, clay, and building stone. Igneous and especially the altramafic rock of the area are especially good host rocks for mineral ores.

We believe that until a comprehensive study has been made, it is incorrect to conclude that significant deposits do not exist within the planning unit. Until an adequate mineral resource study is completed, the Forest Service should recognize the need of permitting continued research.

The conclusion that operation of mining claims "could result in serious conflict" with management objectives is understandable, but seems in conflict with philosophy for overall forest management if the administrative mining regulations (2nd paragraph) concerning exploration and development of mineral resources are complied with. This would be in keeping with planning assumption Number 11 listed on page 37. The formulation of such a plan, placing mineral resources on an equal footing with other resources, is compatible with the "Management Objectives and Constraints" given on pages 37 and 38. These include the Multiple Use Act of 1960 and the Organic Act of 1897.

Salable common material minerals are quite valuable and the timber harvest and management program is heavily dependent upon this mineral material. Without road and associated construction, the area would be relatively inaccessible, and a viable timber management program impossible.

About a third of this section deals with conflicts between minerals and other resources and environmental impacts of mineral production. These problems are properly dealt with in other sections (impacts) of the document and appear inappropriate in the general description.

Page 39 - Although hiker trails and an A.T.V. trail are shown on the map illustrating the proposed action, the text fails to discuss terrain conditions along the trail or any potential impact such as soil compaction or erosion.

Pages 40 and 41, Proposed Action - In the first paragraph, statement "A Fisheries/Recreation Area totaling 2,500 acres will be established to provide improved protection. . .", the word "improved" is not appropriate. How can the existing natural conditions be improved by managing the area to protect those values? The values are already at maximum. The language in the next to last sentence of the same paragraph, ". . . to provide near-maximum protection. . .", more accurately describes what will happen.

It would be helpful to have elements of the proposed action related more directly to the stated management objectives stated on pages 37 and 38.

In the second paragraph on page 41, it is stated that a 5,600-acre Fisheries/Wildlife area will be established to provide "watershed, fishery, recreation, and wildlife values." The statement fails, however, to address the suitability of this area for endangered and threatened species which may occur in the unit. It appears that much of the tract is located on south slopes which, as the draft says, are harsh environments. (Page 41, paragraph 1) The value of the area to the northern spotted owl and the northern bald eagle, which are listed as threatened by the Oregon Wildlife Commission, may therefore be marginal.

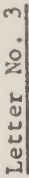
In the fourth paragraph, it is implied that non-game species are given priority over game species. If this is what was intended, then the subject should be discussed further.

The description of the proposed plan contains no mention of management strategies following a wildlife, insect infestation, or other adverse occurrence. Frequently timber salvage operations are initiated too soon after such disasters, causing extreme environmental damage to unprotected soil. Salvaging merchantable timber following a fire, without first allowing ground cover to reestablish, can result in widespread destruction of fish habitat by siltation. Since the Mt. Butler-Dry Creek Unit contains widespread unstable soils and steep terrain, a natural disaster contingency plan would be of the utmost importance. As the environmental statement emphasizes, fish resources within and adjacent to the planning unit are of high economic value.

Page 46, 1st paragraph - If adequate sanitary facilities are provided and property maintained in sites properly located with respect to streams and other water supplies such as wells and springs, the resultant changes and increases in visitor-usage patterns may not result in serious impacts. However, the final statement should indicate what provisions and safeguards will be required and utilized.

Page 51, 1st paragraph - In essence the summary of the position taken toward mineral resources states that the proposed action will not affect the long-term capacity for mineral production because the existing level and apparent potential are low. Until a comprehensive study is made, it is incorrect to conclude that significant mineral deposits do not exist within the unit.

Page 52, Section V - The potential loss of mineral availability resulting from the implication that mineral development would be halted, or at least impeded, should be recognized as an irreversible and irretrievable commitment of that resource.



DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
ARCADE PLAZA BUILDING, 1321 SECOND AVENUE
SEATTLE, WASHINGTON 98101

Pages 53-76, Alternates to Proposed Actions - Mineral resources are not mentioned in the discussion of five alternative plans. Mineral availability is important too and should be a factor considered in every alternative management plan.

Page 94, Appendix C - The monitoring of streams is not described in detail. This appendix lists Oregon Department of Environmental Quality Water standards which are to be "treated as the overriding objective of this Unit." It appears exceedingly doubtful that the proposed road construction and timber harvest could be undertaken without exceeding the turbidity standards, unless this activity would be "specifically authorized," in which case the standard would be meaningless. Also, turbidity is not the best standard for evaluating the proposed action; suspended sediment would be a better parameter.

Sincerely yours,

Charles S. Polityka
for Roy H. Sampsel

Roy H. Sampsel
Special Assistant

Special Assitant to the Secretary

REGION X

Office of
Regional Administrator

Mr. W. P. Ronayne
Forest Supervisor
Siskiyou National Forest
P.O. Box 440
Grants Pass, Oregon 97526

Dear Mr. Ronayne:

Subject: USDA Draft Environmental Statement on Land Use Plan for the Mt. Butler-Dry Creek Planning Unit

We have reviewed the statement submitted with your March 25, 1975 letter.

The proposed action is land use allocations and management direction for 22,100 acres of largely undeveloped forest'land in the Siskiyou National Forest located in southwestern Oregon.

The statement indicates that certain extensive logging activities in the past have caused excessive water run-off resulting in floods and slides. Although your proposed land use allocations should not cause high water run-offs, we would like you to know that our department is encouraging all communities to develop land use controls to minimize flood hazards. Thus, we suggest that in the implementation of your activities that they be closely coordinated with local plans to assure minimum adverse impacts.

We defer to other agencies to comment on areas not within our jurisdiction or expertise.

Thanks for the opportunity to comment.

Sincerely,

James L. Young
James L. Young
Regional Administrator

Date	✓
Action	D
Distric	D
Supv.	✓
Engr.	✓
Firo	✓
Witchod	✓
Signed	
MAY 27 1975	
B & F IN REPLY REFER TO:	
Persm	
Rescoe	
A.J. Sarm	10D
Cont'g	
Purch	
Zone A	
Zone B	

186 phr/set
each



Letter No. 4

DEPARTMENT OF THE ARMY
PORTLAND DISTRICT CORPS OF ENGINEERS

P. O. BOX 2946
PORTLAND, OREGON 97208

NPPEN-EQ

Mr. W. P. Ronayne
Forest Supervisor
Siskiyou National Forest
PO Box 440
Grants Pass, OR 97521

Dear Mr. Ronayne:

This office has reviewed the draft environmental impact statement for the Mt. Butler-Dry Creek Planning Unit, Siskiyou National Forest, Oregon furnished by your agency.

We have no formal comments to make with respect to the Corps of Engineers' areas of responsibility in navigation, flood control and hydropower.

We do wish, however, to supply your agency with our informal comments in other areas, as these may be of assistance to you in preparing the final EIS. These comments have been included in the margins of the text of the draft EIS and are being forwarded under separate cover to Mr. Dave Braley, of your staff, who has requested the comments.

Our overall review of the draft EIS indicates the statement is extremely well done. It does not go into detailed presentation of insignificant impacts, although the reader gets the impression that much backup data exists for the report. Technically, the report is also well done. It does not contain a high "jargon" factor. It identifies for the reader in simple terms the impacts and alternatives, while remaining technically adequate.

We appreciate the opportunity to review and comment on the statement prepared by your agency.

Sincerely yours,

L. J. Stein
L. J. STEIN
Chief, Engineering Division

Info	✓
Action	✓
Distrib. D	✓
Supr.	✓
T. M.	✓
A. G.	✓
Lands	✓
Engr.	✓
File	✓
Withd.	✓

SISKIYOU
2 July 1975 7 1975

L & F	✓
Person	✓
Rescue	✓
Zone I	✓
Zone II	✓

NPPEN-EQ

2 July 1975

Mr. W. P. Ronayne
Forest Supervisor
Siskiyou National Forest
PO Box 440
Grants Pass, OR 97521

Dear Mr. Ronayne:

This office has reviewed the draft environmental impact statement for the Mt. Butler-Dry Creek Planning Unit, Siskiyou National Forest, Oregon furnished by your agency.

We have no formal comments to make with respect to the Corps of Engineers' areas of responsibility in navigation, flood control and hydropower.

We do wish, however, to supply your agency with our informal comments in other areas, as these may be of assistance to you in preparing the final EIS. These comments have been included in the margins of the text of the draft EIS and are being forwarded under separate cover to Mr. Dave Braley, of your staff, who has requested the comments.

Our overall review of the draft EIS indicates the statement is extremely well done. It does not go into detailed presentation of insignificant impacts, although the reader gets the impression that much backup data exists for the report. Technically, the report is also well done. It does not contain a high "jargon" factor. It identifies for the reader in simple terms the impacts and alternatives, while remaining technically adequate.

We appreciate the opportunity to review and comment on the statement prepared by your agency.

Sincerely yours,

L. J. STEIN
Chief, Engineering Division



Letter No. 5

UNITED STATES DEPARTMENT OF COMMERCE
The Assistant Secretary for Science and Technology
Washington, D.C. 20230

Action X	Dist. B. D.	Supv.	Engr.	Fire	Wtrshd	SISKIYOU
AUG 25 1975						
B & F	Personl	Resrce	Ad. Serv.	Cont'g	Purch'g	Zone I
						Zone II

Dear Mr. Ronayne:

This is in reference to your request for comments on the draft environmental impact statement on "Mt. Butler-Dry Creek Planning Unit." Your request was sent directly to the field offices of the National Marine Fisheries Service rather than to this office for comments. The Office of Environmental Affairs is responsible for coordinating the reviews of environmental impact statements and submitting the official views of the Department of Commerce. Accordingly, in the future please address correspondence related to implementing the National Environmental Policy Act of 1969 directly to this office.

We have reviewed the statement and offer the following comments for your consideration.

General Comments

Comments are directed primarily at anadromous fish protection and enhancement within the Mt. Butler-Dry Creek Planning Unit. The draft environmental impact statement describes most of the environmental effects to anadromous fish. However, we believe that it would be appropriate to develop a natural disaster contingency plan and include it in the final statement. Such a plan would provide procedures for protection of the anadromous fish habitat after forest fires or wind storms while still allowing timber managers to remove damaged trees.



August 20, 1975

Mr. William P. Ronayne
Forest Supervisor
Siskiyou National Forest
P.O. Box 440
Grants Pass, Oregon 97526

- 2 -

Specific Comments

Page 17, paragraph 1. Due to limited catch and escapement data for Oregon coastal rivers, we suggested a 5:1 catch/escapement ratio be used for chinook salmon. Ongoing research studies may provide updated catch/escapement data for south coastal rivers of Oregon and provide a better ratio.

Page 40, paragraph 1. We recommend discussing beneficial and adverse impacts of including the entire Dry Creek Watershed in the Fisheries/Recreation area. According to the Fish Commission of Oregon the Dry Creek Watershed is one of the best natural spawning areas for fall chinook along the Oregon Coast. Inclusion of the entire Dry Creek Watershed in the proposed plan would provide better protection of the watershed for water quality and thus aid anadromous fish production.

Thank you for giving us an opportunity to provide these comments, which we hope will be of assistance to you. We would appreciate receiving four copies of the final statement.

Sincerely,

Sidney R. Galler

Sidney R. Galler
Deputy Assistant Secretary
for Environmental Affairs

Letter No. 6

OREGON STATE
HIGHWAY DIVISION

HIGHWAY BUILDING • SALEM, OREGON • 97310

February 27, 1975

Mr. David M. Braley, Forester
Land Use Planning
Siskiyou National Forest
P.O. Box 440
Grants Pass, OR 97526

Dear Mr. Braley:

In response to your letter of January 14, we have reviewed the Mt. Butler-Dry Creek Draft Environmental Statement for Siskiyou National Forest, Curry County, Oregon. Our records show no sites in the area listed on either the National Register of Historic Places or our Statewide Inventory of Historic Places. We request that as part of the planning process a historic site survey be conducted in the area. We have not yet conducted such a survey, and several important sites may be located here.

Our office does not maintain a complete listing of archeological sites in the state. We will forward your letter and the pertinent information to David L. Cole, Museum of Natural History, University of Oregon, Eugene, Oregon 97403, if archeological sites should be taken into consideration.

Thank you for this opportunity to comment.

Sincerely,

Robert K. Sutton
Assistant Park Historian

RKS:gp

cc: David L. Cole



Letter No. 7

DEPARTMENT OF
GEOLOGY AND MINERAL INDUSTRIES

521 N.E. "E" STREET • GRANTS PASS, OREGON • 97526 • Phone (503) 476-2496

ROBERT W. STRAUB
GOVERNOR

Robert W. Straub
GOVERNOR

F. B. KLABOE
Administrator of Highways

April 21, 1975

Mr. W. P. Ronayne
Forest Supervisor
Siskiyou National Forest
P. O. Box 440
Grants Pass, Or. 97526

Subject: Comment on Mount Butler - Dry Creek draft environmental statement.

Dear Mr. Ronayne:

Mineralization in the form of precious metal-bearing lode deposits in association with copper, lead, zinc, and possibly other sulfides may occur in the fringe area of the Pearce Peak diorite body and in the metamorphic rocks of the Golice Formation surrounding the diorite. Re-working of the Cretaceous conglomerates by natural stream erosion would tend to release any gold trapped in these sediments and concentrate it in the present stream gravel bars.

The South Fork of Sixes River immediately north of Mount Butler has had significant placer gold production in the past and probably still represents a mineral resource potential; especially with the current high price of gold.

Placer mining activity along Elk River has been much less productive than that of Sixes River and the drainage area of Dry Creek likewise does not appear to be particularly favorable for the accumulation of gold.

The warding of the second paragraph under minerals on page 25 presents a rather negative, prejudiced and I think unfair attitude toward potential mining activity. Mining operations can be conducted without severe environmental damage and temporary environmental damage can be reduced by good reclamation practice.

Your proposed action seems reasonable.

Thank you for the opportunity to comment on this planning unit.

Sincerely,

Len Romp
Resident Geologist

LR:rep

cc: R. E. Corcoran, State Geologist

Info	✓
Admin	✓
Plumb, D	✓
Supv.	✓
T. M.	✓
A. G.	✓
Leads	✓
Engr.	✓
Fire	✓
Washed	✓
SISKIYOU	✓
APR 22 1975	✓
(503) 476-2496	✓
Person	✓
Reserve	✓
Ad. Serv.	✓
Cont'g	✓
Purch'g	✓
Zone I	✓
Zone II	✓

W/ 10/1/107 each

OREGON WILDLIFE COMMISSION
staff comments on
draft environmental statement
MT. BUTLER-DRY CREEK PLANNING UNIT

Siskiyou National Forest
April 29, 1975

The action proposed by the Siskiyou National Forest for management of the Mt. Butler-Dry Creek Planning Unit is opposed. Reasons for the opposition include:

1. Value of streams within the Unit to anadromous fish runs in the Elk and Sixes Rivers;
2. Impact of the action on wildlife;
3. Critical nature of the soils within the Unit;
4. Lack of stream protection provided by the action.

Each of these items will be discussed separately with the data taken from the draft statement.

Value of streams to fish runs

The total annual net value of sport and commercial fisheries for anadromous fish in Elk and Sixes Rivers exceeds \$1.5 million. Of this total, streams within the Planning Unit produce nearly 30 percent of the fishery value, \$442,000. Dry Creek, one of the two remaining unlogged tributaries to Sixes Rivers, comprises only 16 percent of the total watershed yet produces 65 percent of the salmon and 25 percent of the steelhead and sea-run cutthroat trout that enter Sixes River. Rock Creek, Anvil Creek and Red Cedar Creek produce over 30 percent of the coho salmon that utilize Elk River and, collectively, contain over 7,700 square yards of spawning gravel.

Impact on wildlife

The proposed action will steadily reduce the carrying capacity of the Unit for the spotted owl by nearly one-half. The action could also have adverse impacts on bald eagles and other nongame species.

Comment

Whereas some species of wildlife may benefit by increased forage production from logging, two species listed as threatened in Oregon would decline in number. In addition, mass soil movement and road construction would take considerable land out of production to the detriment of forage growth.

Critical nature of soils

Land forms are steep with slopes averaging 80 percent, but some exceeding 100 percent. About 90 percent of the soils are classified as critical with high to severe erosion potential. Stability class is either unstable or highly unstable. In cases where the ground surface has been disturbed avalanches have been continuous problems. Rehabilitation has been a slow process because of continual surface movement.

Comment

Experience has shown, on the Siuslaw National Forest and similar areas, that road construction in this type of terrain leads to problems. Such operations result in soil movement, sedimentation of streams, degradation of water quality and destruction of fish habitat.

Lack of stream protection

In past logging operations, sedimentation and raveling rock mulch slopes in Butler Basin seriously damaged fish habitat in Butler Creek and caused significant sedimentation in the main stem Elk River. Similar problems occurred in the headwaters of Dry Creek following logging operations on Section 36 lands. Harvest of trees along most of the upper Sixes River and its tributaries has caused an increase of water temperatures due to solar heating. Summer temperatures in the lower Sixes River frequently reach 82 degrees, lethal levels for salmon and trout. Dry Creek is one of the two remaining tributaries of Sixes River that still retains much of its streamside habitat.

Comments

The Streamside Management Unit guidelines are cited as the tool to protect streams in the Planning Unit. The SNU policy is adequate protection for streams and fish habitat in many areas. It is not adequate in the Planning Unit for two reasons.

1. Mass soil movements cannot be prevented because the guidelines only apply to the stream and adjacent habitat.
2. Operations are allowed in Class II and IV streams that would increase the potential for sluice-outs or other failures. Allowances include: road construction in stream channels if the channel is left relatively undisturbed (Class III); if it cannot be reasonably avoided, felling, skidding and road construction are permitted across stream channels providing the operations at periods of low flow and stream banks and channel disturbances are minimized (Class IV).

In an area, such as the Planning Unit, with slopes averaging 80 percent, with 90 percent of the soils being critical, unstable and with high to severe erosion potential, disturbance of stream

channels and banks cannot be "minimized"; road construction in stream channels cannot leave the channel "relatively undisturbed." The inability to operate in unstable, steep terrain led to the formulation of the USFS Region VI Fish Habitat Management Policy. An excerpt from that policy is quoted below and the recommendation is made that the quoted section be applied in the Planning Unit.

"In areas where soil conditions are judged to be so sensitive that roads cannot be constructed or that timber cannot be harvested by any logging system without degrading water quality below State standards or causing unacceptable fish habitat damage, the timber will be left standing and the area classified as unproductive, permanently inoperable, forest land."

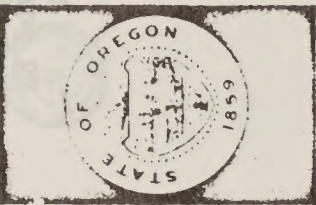
Management of the Mt. Butler-Dry Creek Unit should have as its primary objective protection of the Dry Creek, Anvil Creek, Rock Creek and Red Cedar Creek watersheds. The proposed action will not provide the needed protection and, as stated previously, is opposed. Watershed values can be protected in one of two ways:

1. Inclusion in the Wilderness Preservation System as outlined in Alternative 1;

or

2. Managed as suggested in Alternative 2 with the following modifications:

- a. Place Rock Creek, Anvil Creek and Red Cedar Creek in the Roadless Recreation Area
- b. Delete the road proposed for the present route along the Grassy Knob Trail.
- c. Delete the trail system proposed for the Dry Creek system.
- d. All timber removal and road construction activity in the Butler Creek drainage follow either the SMU policy or the Region 6. Fish Habitat Management Policy.



Robert W. Straub
GOVERNOR

COMMISSIONERS

JOSEPH L. EOFF
Chairman

JACK F. SHIELDS
Vice Chairman

MAKKEE A. SMITH
Member

THOMAS E. KRUSE
State Fisheries Director

Mr. William P. Ronayne
Supervisor, Siskiyou
National Forest
Post Office Box 440
Grants Pass, Oregon 97526

Dear Mr. Ronayne:

DRAFT ENVIRONMENTAL IMPACT STATEMENT MT. BUTLER-DRY CREEK PLANNING UNIT

Members of my staff have reviewed the draft environmental statement for the Mt. Butler-Dry Creek planning unit. It is one of the most comprehensive Forest Service EIS's we have reviewed and we compliment your staff.

The first 38 pages of the statement discuss resource relationships and values as well as physical features of the planning unit. We are concerned about the steep slopes and fragile soils that occur throughout much of the unit and the effect on water quality and fish life of proposed forest operations under these conditions. We consequently believe that such operations in the unroaded portions of the planning unit should be permitted only with extreme care or not at all.

Potential damage to the fish resource from turbidity, temperature increases, and reduced summer streamflows is of further concern. Control of factors that could change existing conditions is essential for resource protection.

Specific concerns we have with the draft statement and the proposed plan of action follow:

1. The fisheries values on pages 18-19 and 47 may be inconclusive with respect to contribution of Elk River Hatchery. We are

Letter No. 10

FISH COMMISSION

OFFICE OF THE DIRECTOR

307 STATE OFFICE BLDG. • 1400 S.W. 5th AVE. • PORTLAND, OREGON • 97201

May 20, 1975

Info	✓
Action	✓
Control	✓
Subj.	✓
T. W.	✓
A. O.	✓
Lands	✓
Engr.	✓
Fire	✓
Wildlife	✓
State	✓
May 21 1975	✓
97201	✓
Rec'd	✓
File	✓
200, 11	✓
File	✓
4/21/75	✓
4/21/75	✓

uncertain if the hatchery's present and potential contribution to runs and fisheries in other Curry and Coos County streams through supplemental fish stocking was fully considered in developing values in the statement. We request more information on how these values were developed. Our research studies are only now beginning to provide information to measure the hatchery's value to the sport and commercial fisheries of the south coast. Collection of more complete information will require additional time.

2. The \$441,000 net annual value for fisheries attributable to the planning unit (page 47) does not seem a fair comparison to the \$750,000 gross value given for timber production. Fisheries values appear to have been underestimated based on the substantial proportion of fish production in both the Elk and Sixes systems which would be impacted within and below the planning unit.

3. The high fishery values discussed in the EIS and the risk of losing these values casts doubt on the advisability of extensive road construction and timber harvest under conditions found in the planning unit.

4. We must by necessity judge the impacts of the proposed plan on observations of logging activities in situations similar to those in the planning unit, such as the eastern part of the Butler Creek drainage. In this case, road construction, harvest and post-harvest burning have been devastating to Butler Creek and have also caused serious losses of soil and timber production ability in the area harvested.

5. Continuous monitoring of water quality and other environmental factors during operations under the proposed action would be helpful but could only document what happened "after the fact." Restoration of any loss to fish resources would be difficult if not impossible.

6. Based on our prior experience with logging practices in southwest Oregon, the plan appears overly optimistic in being able to supervise and control ongoing activities to prevent short and long-term negative impacts to the fishery resource. Soil failures and erosion problems, in some cases even where advanced practices were applied, lead us to view road and timber operations in high hazard areas such as the planning unit with considerable apprehension. Often there has been a breakdown between planning and the results achieved after completion of an operation.

7. Recently, we observed aerially harvested sites and new end haul road construction in drainages near the planning unit. While control over erosion, site instability, and buffer zones along streams appeared dramatically improved over those from prior practices, most of these operations were scattered and only recently completed. The ability to prevent soil erosion, water turbidity, and increases in water temperature with sophisticated management techniques has not been demonstrated over a sufficient period of time under conditions found in the planning unit to assure success.
8. The proposed action appears to be primarily supported by gross impact on local and regional economics from timber harvest without full consideration of the potential loss to socio-economic values derived from fishery resources if they cannot be fully protected.

Alternative 1, with proposed constraints on further management of Butler Creek drainage, offers the best assurance that fisheries values in the planning unit (including Elk Creek hatchery) will be protected. However, we do not believe the area would support a wilderness designation and therefore further study for that purpose may not be justified. Alternative 2 would also provide a high level of fish resource protection if the following conditions are met:

1. The Rock Creek and Anvil Creek drainages are placed in a Fisheries/Recreation or Fisheries/Wildlife zone designation;
2. The road system following the Grassy Knob trail is deleted; and
3. All management constraints in the statement are imposed on future activity in the Butler Creek drainage.

Because we are not convinced that management activities stated in the proposal can be undertaken and provide the necessary fish resource protection, we request adoption of Alternative 2 with the above mentioned modifications. If Alternative 2 is infeasible, we urge delay of entry into the remaining roadless areas of the planning unit for at least five years or until it can be demonstrated that management actions and the constraints on them will provide the desired long-term results.

In cooperation with your staff and the USGS, we have recently initiated collection of water quality baseline information from Elk River and Dry Creek. A delay of entry into the remaining roadless areas is necessary to establish baseline information on water quality, streamflows, and productivity of streams that can be impacted by future activities. We would cooperate in this activity to the extent of our capability.

Mr. William P. Ronayne
May 20, 1975
Page 4

A delay in entry would also provide your staff with more time to determine if aerially logged sites in settings similar to the planning unit can retain their initial stability and can be successfully regenerated with young trees. Regeneration techniques for sites similar to those in the planning unit would be further tested. The stability of material from new road construction will be brought into better focus.

Monitoring of buffer and leave strips in similar areas is also needed to determine if present techniques are adequate or if buffer strip criteria need modification.

In selection of Alternative 2 or in delaying entry to the roadless areas, we believe extension of operations into Sections 30 and 32 of the Butler Creek basin with all the constraints and guidelines stated in the EIS would be acceptable on a demonstration basis along with close monitoring of completed operations here and in other nearby drainages.

In continuing operations in the Butler Creek Basin, we would hope road construction would be independent of timber sale receipts and of minimum width with paved surfaces. Construction overburden should be end hauled and stabilized in suitable locations. Harvesting should include directional felling and lining of trees and application of an aerial yarding system. We would expect all material from spur roads and landing sites to be left in a stable condition. We would recommend against post-harvest burning of any unit. It would be necessary to design stable buffer strips on Class I and Class II streams and perhaps many Class III streams. Along with sophisticated construction and logging systems, a high degree of supervision and monitoring would be necessary to demonstrate long-term feasibility of meeting goals of timber harvest and maintenance of water quality. The outcome of delaying entry should provide an improved basis to develop management for the roadless parts of this planning unit.

We appreciate the opportunity to comment on the draft statement and your proposed plan of action.

Sincerely,

Thomas E. Kruse

THOMAS E. KRUSE
STATE FISHERIES DIRECTOR

cc Oregon Wildlife Commission

Letter No. 11



City of Port Orford, Oregon

97485

May 14, 1975

Mr. W. P. Ronayne
Siskiyou National Forest
Grants Pass, Oregon 97526

Dear Mr. Ronayne:

At their regular meeting, May 13, 1975, the City Council of the City of Port Orford passed a motion to comment in support of what will be the State of Oregon Fish Commission final position with reference to the Mt. Butler-Dry Creek Environmental Impact Statement.

Sincerely,

Leon White

Leon White, Mayor
LW/lw

cc: Oregon State Fish Commission

Letter No. 12

Port Orford Port Commission

PORT ORFORD, OREGON 97465

May 19, 1975

W.P. Ronayne
Supervisor
Siskiyou National Forest
Grants Pass, Oregon 97526

Dear Mr. Ronayne:

The Port of Port Orford Commission at its April 21 meeting passed a resolution supporting Alternative No. 2 of the Mt. Butler-Dry Creek Timber Management Proposal as outlined in the DRAFT Environmental Impact Statement.

The Commission deems it of vital importance that further study be given to the impact of proposed management plans with regard to the effect on the Elk River Salmon Hatchery and agriculture, as well as timber.

Sincerely,

Paul D. Peterson
Paul D. Peterson
President
Port of Port Orford

Letter No. 13

City of Powers

P.O. Box 250

Powers, Oregon 97466

June 5, 1975

Mr William P. Ronayne
Siskiyou National Forest Sup.
Grants Pass, Oregon 97526

Dear Mr Ronayne:

The City of Powers would like to suggest the Forest Service purposal on the Mt. Butler-Dry Creek Draft Environmental.

Yours truly

Lillian Ross
Lillian Ross
City Recorder
P.O. Box 250
Powers, Oregon 97466

Info	X
Action	
Disb. D	
Adm.	
Inv.	
Asst.	
Land	
Eng.	
Fire	
Wild	
Washed	
SISKIYOU	
MAY 21 1975	
B & F	
Permit	
Reserve	
Ad. Serv.	
Contg.	
Permit	
Zone I	
Zone II	
pt/ret	
w/ — each	

Coquille

Oregon
97423

Letter No. 14

June 18, 1975

Mr. W. P. Ronayne
Forest Supervisor
Siskiyou National Forest
P. O. Box 440
Grants Pass, Oregon 97526

Mr. Ronayne:

At their regular meeting, Monday June 16th, the Coquille City Council agreed to a position of supporting the Forest Service's proposed action on the Mt. Butler - Dry Creek Planning Unit.

We feel that the compromise suggested in the proposed action alternative is in the best interests of the area's development and we give our support to this proposed action. Our decision is based strictly on the information provided in the draft environmental statement you developed.

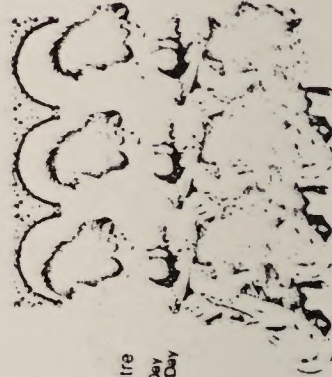
Cordially,

George T. Weldon

George T. Weldon
City Manager

GTW:ly

Sawdust Theatre
Memorial Day
 thru Labor Day



Mr. W. P. Ronayne	✓
Forest Supervisor	✓
Siskiyou National Forest	✓
P. O. Box 440	✓
Grants Pass, Oregon 97526	✓
Mr. Ronayne	✓
City Manager	✓
City of Coquille	✓
June 18, 1975	✓
George T. Weldon	✓
City Manager	✓

4/5 PM:let
encl.



Letter No. 15

PLANNING DEPARTMENT

COUNTY OF CURRY

P.O. Box 1123 • Gold Beach, Oregon 97444 • Phone 247.7
June 24, 1975

William P. Ronayne
Siskiyou National Forest
Box 440
Grants Pass, Oregon 97526

Dear Mr. Ronayne:

We find the Mt. Butler-Dry Creek draft environmental impact statement to be a generally accurate and conscientious document. We basically support the use of Alternative 3 as the proposed land management plan.

However, the document recognizes the low tolerance level of the Elk River Fish Hatchery and has sustained some seemingly justified criticism in this regard. The Oregon Fish and Wildlife Commission and others have indicated support for a modified Alternative 2 as the land management plan in order to preserve fishery values.

The EIS recognizes a yearly fishery value of \$441,170 in the planning unit, \$270,000 of which is attributed to the Elk River. Overall values for Elk River fisheries were estimated at \$1,228,950, and those of the Sixes were estimated at \$308,420. In terms of dollar amounts, this makes the Elk River approximately four times as valuable as the Sixes River as a fishery. In addition, the 1973 replacement value of the Elk River Fish Hatchery was placed at \$834,000. On the other hand, the majority of the timber proposed for harvest is in the Sixes River drainage.

It would seem that concern for the Elk River Fish Hatchery and the river's salmonid fishery could be set aside at a relatively low cost. This could be done by altering the boundary of the proposed timber management zone to exclude all of the Red Cedar and Anvil Creek drainages. If this were done, the effect of alternative 2 would be less than that of an unmodified Alternative 2 as regards the Elk River.

Elimination of the proposed hiker trails in the Fisheries/Wildlife area would tend to consolidate the attitude that the Fisheries/Wildlife area is to be entirely unaltered hinterland for the purpose of maintaining the Elk River Fish Hatchery and salmonid fishery, while at the same time reducing fire danger and the investment necessary for developing the unit.

Mr. William P. Ronayne

2

June 24, 1975

The area can provide continued economic benefits from both timber and fisheries. Alternative 3, as modified above would seem to provide a balanced approach to the use of the resources in the area. Any value diminution caused by loss of timber in the Elk River drainage would seem to be more than compensated for by the continued operation of the Elk River Fish Hatchery and the economic benefits of the river's fishery.

The projected economic benefits of Alternative 3 represent almost 100% more than those of Alternative 2 in terms of timber value. The economic situation at the present time, particularly in the north county area, militates toward wise economic as well as environmental policies. We think that the continued fisheries of the area need not be assured at the expense of reducing the timber harvest by half.

Yours very truly,

Burton Weast, Planning Director

Curtis D. Brown

Curtis D. Brown, Planning Technician
Curry County Planning Department

CB:rmg

Letter No. 16

County of Coos

BOARD OF COMMISSIONERS
Coos County Courthouse
Coquille, Oregon 97423

Lonnie Van Elsberg
M.R. "Mickey" Moffitt
Woody Robison

Siskiyou National Forest
Grants Pass, Oregon 97526

Attention: Mr. W.P. Ronayne

Dear Mr. Ronayne:

This letter has been prepared in response to the Forest Service inquiry regarding the Mt. Butler-Dry Creek Draft Environmental Statement.

Based upon the examination of the Draft Environmental Statement and a recent field trip examination of the general area, it is believed that the proposed Forest Service action would be a good management proposal for this area.

Reasons which tend to support the proposed action are as follows:

1. This action appears to contain an equitable balance of management aspects to achieve good utilization of the various resource values.
2. It appears that the Forest Service has attained extensive knowledge related to management techniques in this area and is therefore capable of carrying out the proposed action as outlined in the Draft Environmental Statement.

Sincerely,

BOARD OF COMMISSIONERS

William P. Ronayne
Chairman

Lonnie Van Elsberg
Commissioner

Woody Robison
Commissioner

三才圖會

Jack Waldie
xxxxxx

LESTER F. WILLIAMS
COMMISSIONER

II. OF CLERGY.

P. O. BOX 746
LAKE OREGON 97444

Mr. William Ronayne
Forest Supervisor
Siskiyou National Forest
P.O. Box 440
Grants Pass, Oregon 97526

Dear Mr. Ronayne;

Enclosed please find a copy of comments made by the Curry County Planning Commission on the Butler Valley - Dry Creek Planning Unit.

The Curry County Board of Commissioners support the comments and recommendations of the Planning Commission and ask that these comments be considered in your report.

Sincerely,

Glen Hale, Chairman

Jack Waldie, Commissioner

L. R. Williams, Commissioner

GH:jn

Enc.

[illegible]

Black Arch on the Curry Coast

COUNTY OF CURRY

PLANNING DEPARTMENT

P.O. Box 1123

June 24, 1975

William P. Ronayne
Siskiyou National Forest
Box 440
Grants Pass, Oregon 97526

Dear Mr. Ronayne:

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However, the document recognizes the low tolerance level of the Elk River Fish Hatchery and has sustained some seemingly justified criticism in this regard. The Oregon Fish and Wildlife Commission and others have indicated support for a modified Alternative 2 as the land management plan in order to preserve fishery values.

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It would seem that concern for the Elk River Fish Hatchery and the river's salmonid fishery could be set aside at a relatively low cost. This could be done by altering the boundary of the proposed timber management zone to exclude all of the Red Cedar and Anvil Creek drainages. If this were done, the effect of alternative 3 would be less than that of an unmodified Alternative 2 as regards the Elk River.

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Mr. William P. Ronayne

2

June 24, 1975

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Yours very truly,

Burton Weast, Planning Director

Curtis D. Brown

Curtis D. Brown, Planning Technician
Curry County Planning Department

CB:rmg

May 12, 1975

Regional Supervisor - USFS
Siskiyou National Forest
P.O. Box 440
Grants Pass, OR 97526

Dear Sir:

The Mt. Butler-Dry Creek EIS has been reviewed by members of the Stream Habitat Committee of the American Fisheries Society, Oregon Chapter. The informational data for the EIS appears quite accurate and well stated. The fisheries section was quite well presented. However, the facts presented do not lead the Committee to conclude that alternative Number 3 is the best course of action.

The USFS proposed alternatives list leads the Committee to recommend alternative Number 1 as the best choice, with Number 2 as second choice. Alternative Number 3, as recommended by the USFS, is unacceptable.

The following comments briefly outline our reasons for rejecting Number 3 and choosing Number 1:

1. The soils in the area are extremely hazardous and unstable for road construction and the terrain is very rugged. Alternative 3 calls for 34 miles of road to be constructed in the area. It states the best methods of construction will be used to minimize erosion. No detail of the techniques to be used was presented. A statement in the EIS indicates that erosion from road construction can be minimized by building ridge-top road systems.

The soils in this unit are dominated by the Humbug Mountain and Rocky Point formations which are very similar and very unstable for road construction. There is little doubt that the best techniques will minimize road failures, but this does not mean failures will be eliminated. The fact remains that failures will occur and there is no way to prevent them from occurring on a 34 mile long road system in this fragile terrain. Even a few failures can be extremely damaging to the known fisheries resources of the area.

2. The fisheries values are composed of Elk and Sixes River stocks. Chinook stocks are the most valuable fish in the system comparatively speaking.

The Elk River Hatchery has a very limited capacity to cope with excess turbidity. Excess turbidities for any prolonged period of time, as could be expected from a road failure, could easily destroy part or all of the hatcheries annual production. Due to the fact that the hatchery depends upon direct river water intake, it is extremely vulnerable to turbidities of the type that can be expected should alternative Number 3 be carried out. The potential for pollution will exist as long as the roads exist. Many failures do not occur until several years after roads are built.

The Sixes River stocks which are 70% produced by Dry Creek will be vulnerable to failures which can cause jams or sluiced out whole drainages. Mass failures from roads have, in the past, totally devastated

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streams by scouring out eggs and juvenile fish. Chronic erosion from side caste and "weeping-failures" have caused reduced productivity in drainages over many years. The risk to the Chinook runs in Dry Creek from a road failure are too great to allow alternative Number 3 to be implemented.

It must be stressed that the Elk and Sixes River stocks of fall Chinook are a unique run of fish that hold promise for the entire South Coast region. Presently, these fish are being used to re-establish a Coos River run destroyed by logging and over-fishing in the 1930's and 1940's. Nearly a million fingerling have been released into the Coos River system each year for the past two years. This fact was not mentioned in the EIS nor was its economic worth estimated. There is no way of knowing for several more years what this may yield in dollars to the economy. The resource of Chinook eggs for such projects is very limited and should not be jeopardized in any way.

There are too many factors in the EIS that are left to the future. Road location, as well as timber units, trails, etc., is left up to the field staff. Judging from past experiences, the best judgement and techniques available will not be good enough to prevent damage to the fisheries resource in this fragile area.

If the USFS is to pursue a plan that will build road and harvest timber in the Mt. Butler-Dry Creek area, it must provide a detailed layout of its proposed roads and harvest units. A one page map of a 34 mile road system is not adequate and would not appear to meet the intent or requirements of NEPA. This is an extraordinary area and will require very unusual considerations. These considerations may require more manpower than the USFS would be able to devote to such a difficult and time consuming project. If so, it may be wise to choose alternative 1 or a modified version that would place the area in a holding category removed from the allowable cut until such time timber can be harvested and roads built without risk to the watershed and fisheries resources.

In closing, it must be noted that the proposed alternative number 3, if implemented, will most probably violate Region 6 Fish Habitat Management Protection Policy.

Sincerely yours,

John W. Anderson

John W. Anderson

Chairman: American Fisheries Society, Oregon Chapter, Stream Habitat Committee

Letter No. 19

NORTH WEST TIMBER ASSOCIATION

1000 N. W. 10th St. • BUTLER, OREGON 97405

TELEPHONE 462-0100

May 19, 1975

Mr. William P. Ronayne
Supervisor
Siskiyou National Forest
P. O. Box 440
Grants Pass, Oregon 97526

Subject: Draft Environmental Statement
Mt. Butler-Dry Creek Planning Unit

Dear Bill:

After careful consideration of the proposed alternatives for the Mt. Butler-Dry Creek Planning Unit, we find your proposed action to be acceptable.

However, we are supporting your proposed alternative only because we feel, as a practical and political matter, it is the most acceptable of those proposed. We prefer more emphasis on commodity production, in addition to recognizing the importance of protecting the area's other resources. An additional choice is a hypothetical alternative 3.5, which would be a mix of alternatives 3 and 4. This would have been our choice of the optimum management level for the planning unit.

The report gives general statistical information as to the relative productivity of land within the planning unit. This information would be more meaningful to us if a map of the area denoting the land's relative potential to produce timber had been included. This would have enabled us to make a more accurate assessment of the timber growing potential of the various management areas within the unit. We would appreciate seeing such information included in any reports you publish in the future.

May 19, 1975 William P. Ronayne

Page 2

Both you and your staff are to be complimented for having done a highly professional job of land use planning. The report is a relatively unbiased evaluation of the area's potential to furnish both commodity and amenity benefits, and reflects the involvement and co-operation of many disciplines.

Thank you for this opportunity to comment on your proposed management plan for the area.

Sincerely,

NORTH WEST TIMBER ASSOCIATION

Stanley F. Richards
Stanley F. Richards
Forester

SFR:lg

CC: D. W. Johnson
L. N. Krauss, Jr.

Info	✓
Action	✓
Distib. D	✓
Supv.	✓
T. M.	✓
A. G.	✓
Lands	✓
Engr.	✓
Fire	✓
Washed	✓
SISKIYOU	✓
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Permit	
Zone I	
Zone II	

Stanley F. Richards
Stanley F. Richards
Forester

Letter No. 20

**POWERS CHAMBER
of COMMERCE**
P. O. Box 116
Powers, Oregon 97466
Gateway to the
MIDDLE
ROGUE RIVER

GOOD HUNTING and FISHING
"The Community With a Future"
MAY 21, 1975

William F. Ronayne, Forest Supervisor
Siskiyou National Forest
PO Box 440
Grants Pass, Oregon 97526

Dear Mr. Ronayne:

As members of the Powers Chamber of Commerce, having studied the alternatives relative to the management of the Mt. Butler-Dry Creek project and feeling that our Forest Service Technicians are the best qualified in judging the most productive/least damaging use of our forest lands, agree with and support your #3 Alternative choice.

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May 23 1975

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GOOD HUNTING and FISHING
"The Community With a Future"
POWERS, ORE
May 21, 1975

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Lynn Ranch Pavers Washburn Box B Pavers
Spitzkahn Pavers Washburn Ave. Box 399 Pavers
Burns City Pavers Pine Box 525 Pavers
Hackerman Pavers Pavers & Co. - 350 2nd St.
Pennant Lumber Shop Box 539 Pavers Ave
Martins Wood Shop Box 539 Pavers Ave
Jos. Smith's also Po Box K Pavers Dr
Sheepskin Store P.O. Box J Pavers Ave
R & R Pavers SHOP PC Post 491
Kathie Wilson - Bill's Tavern Box 233 Pavers One.
Harsh Pavers p & s repair Box 251 Pavers
Robert E. Hines Miner Box 465 Paver or
Pavers - Rock & P. Box 265 Pavers Or
Edgar Pavers "Hillside Pavers" Box 566
Leach E. M. Perry Pavers Trading Post Box 512
Norrene J. Robinson Dr. Beauty Shop Box 461 Pavers

Letter No. 20

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William F. Ronayne, Forest Supervisor
Siskiyou National Forest
PO Box 440
Grants Pass, Oregon 97526

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May 23 1975

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GOOD HUNTING and FISHING
"The Community With a Future"
POWERS, ORE
May 21, 1975

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Leach E. M. Perry Pavers Trading Post BX # 512
Norrene J. Robinson Dr. Beauty Shop Box 461 Pavers

MOORE MILL & LUMBER CO.

Manufacturers of

PACIFIC COAST FOREST PRODUCTS

TELEPHONE 347-2412
BANDON, OREGON 97411

May 21, 1975

Bill Royayne
U. S. Forest Service
P. O. Box 440
Grants Pass, Oregon 97526

Re: Mt. Butler - Dry Creek Environmental Statement

Dear Sir:

After completely reviewing the above mentioned document I feel that alternate #4 should be implemented.

Alternate #4 best suits the economic needs of the community in both forest and fish management.

As a native of Coos and Curry County and being familiar with the area I find alternates 1 and 2 ridiculous. I doubt that there are a dozen people in Oregon that would consider this area, other than the Elk River, to be a recreation area.

Very truly yours,

Bill Foster

Bill Kistner
Timber Manager
Moore Mill & Lumber Co.

Letter No. 22

SOUTHERN OREGON TIMBER INDUSTRIES ASSOCIATION

2680 NORTH PACIFIC HIGHWAY • MEDFORD, OREGON 97501 • PHONE (503) 753-5789

Forest Supervisor
Siskiyou National Forest
PO Box 440
Grants Pass, Oregon 97526

May 21, 1975

Dear Sir:

Please be advised that this organization wishes to go on record in support the 'proposed action' summarized in your draft environmental statement for the Mt. Butler-Dry Creek Area. We are pleased with the thorough manner in which alternatives have been examined, and we appreciate the opportunity to review management plans.

One point concerning your economic analyses disturbs us. We note very thorough consideration and evaluation of all possible impacts of fisheries use, but lack of similar treatment for timber use. We hope you will agree that if values of fish and fishing are included, it would only be equitable to include similar valuations for timber use and products obtained. Certainly, it is incomplete to tabulate stumpage value only.

Sincerely yours,

Martin Craine
Martin Craine
Secretary-manager

CABAX

LUMBER DIVISION
TELEPHONE 503-476-6696 • TWX 503-340-0470
P.O. BOX 377 • GRANTS PASS, OREGON 97526

MILLS

PLYWOOD DIVISION GENERAL OFFICE
TELEPHONE 503-342-4401 • TWX 503-465-6466
P.O. BOX 449 • EUGENE, OREGON 97401

May 21, 1975

Forest Supervisor
Siskiyou National Forest
P.O. Box 440
Grants Pass, Oregon 97526

This is concerning the Mt. Butler-Dry Creek Planning Unit. Basically, we agree with your selection of alternative #3 as the proper management for this area however, we do have a few concerns.

One is that a further drop in the allowable cut of timber has not been reflected adequately in its importance, either locally or nationally. We feel that any withdrawal of land from timber management should be matched by a more intensive management commitment on remaining lands to at least hold the allowable cut at its present level. Also, we would like to see truly intensive forest management on prime timber growing areas be explored more thoroughly as a possible alternative to show the very maximum production possible without any restrictions of visual impact, non-declining yields, recreation, etc.

Another concern that we have is that land use planning guidelines for national goals and needs seem to be missing. It appears that the only guidelines being used to make a decision are from very local public input, most of which is radical one way or the other, resulting in the Forest Service trying to take a middle-of-the-road position. This may be proper, however, we feel that any reduction of allowable cut will be in direct opposition of national needs in the near future and such things as fisheries, visual impacts, wilderness in wild areas will have to take a minor role in prime timber producing areas.

Again, with the information and guidance that the Forest Service has at this time, we agree with your proposed management plan for the Mt. Butler-Dry Creek Planning Unit.

Sincerely,

CABAX MILLS LUMBER DIVISION
Fred Hitchens
Fred Hitchens, General Manager

FK/rs



Letter No. 24

FRIENDS OF THE EARTH, INC.

529 COMMERCIAL SAN FRANCISCO, CA

21 May 1975

Mr. William P. Ronayne
Forest Supervisor
Siskiyou National Forest
P.O. Box 440
Grants Pass, Oregon, 97526

Dear Mr. Ronayne:

Friends of the Earth has reviewed the Draft Environmental Statement for the Mt. Butler-Dry Creek Planning Unit in Curry County, Oregon, Siskiyou National Forest. We find the DEIS to be inadequate in several ways, and we wish to propose alternative management directions for the area concerned.

Friends of the Earth advocates the formation of a New Wilderness Study Area, in accordance with Alternative 1 in the report. We find the potential for erosion to be so great in this area that it poses a severe and immediate threat to the fisheries resource of the area which mitigates any potential timber values. The area under consideration is far too rugged and steep, with severely unstable soils: in an area such as this, given present technology, any timber harvest will have a severe adverse effect on the fishing industry of the area, which was shown in the report to be more economically valuable than the potential timber harvest.

We note, in addition, that timber demand is very low at the present time; therefore, the economic and social rationale which is used for the proposed management plan has dubious value. It is our belief that a timber harvest in this area poses a grave threat not only to the natural environment of this area, which is ideally suited to wilderness recreation, but to the local economy. Once a sedimentation problem is triggered, it will be very difficult to arrest. We do not believe that an extensive timber harvest such as the one which is planned can successfully coexist with a healthy and increasingly productive fishing industry of the type which now exists in the area.

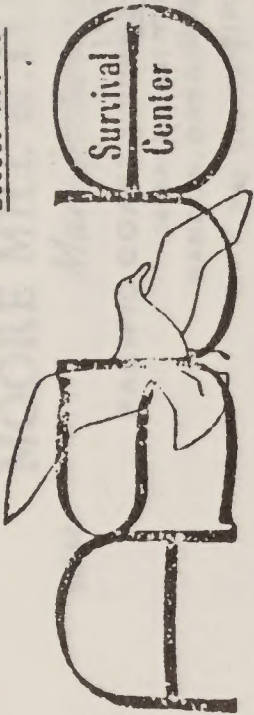
We therefore propose the formation of a New Wilderness Study Area for 16,500 acres of the Mt. Butler-Dry Creek Planning Unit. We appeal to the Forest Service to consider the wilderness values of this rugged and primitive land, as well as the threat to the local economy which is inherent in timber harvest plans.

Sincerely,

Michael Storper

Michael Storper
Conservation Assistant

Letter No. 25



Associated Students—University of Oregon
XXXXX Suite 1
P.O. Memorial Union
University of Oregon
Eugene, Oregon 97403
(503) 686-4356

Mr. William P. Ronayne
Superintendent Siskiyou National Forest

Dear Sirs,

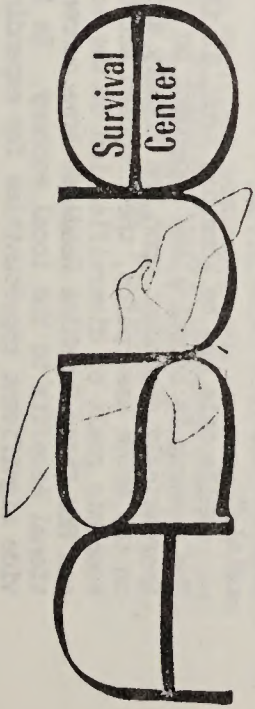
Enclosed please find the Survival Center's comments on the Mt. Butler-Dry Creek Planning Unit Draft Environmental Impact Statement. These comments are written by our EIS staff. I hope they will be of some assistance to your staff in preparation of the proposed action.

Thank you.

Mary Minniti
Mary Minniti
Director

P.S. Please send any pertinent correspondence directly to our EIS Staff.

MM/d



Associated Students—University of Oregon

M-111
Erb Memorial Union
University of Oregon
Eugene, Oregon 97403
(503) 686-4386

May 22, 1975

"Survival Center Response to Mt. Butler-Dry Creek Draft EIS"

The Survival Center has reviewed the Mt. Butler-Dry Creek Draft EIS. We appreciate this opportunity to comment on this EIS. We are very alarmed at the developing course of planning in Region 6 of the U.S. Forest Service. The Environmental Impact Statement for the Mt. Butler-Dry Creek Planning Unit is another example of planning based on political considerations, with only token consideration of the environmental impacts of the proposed actions.

The following analysis takes two tasks: First, if we follow the assumptions of the Forest Service that the area should in part be subjected to the impacts of timber management, then what improper reasons and assumptions have been used to support the Proposed Action; second, that the best, most beneficial use of the roadless area within the planning unit would be to preserve it as natural ecosystems.

Basically we feel that it is entirely unreasonable, unwise, and irresponsible to commit this last sizable area of a unique coastal ecosystem to logging and road construction. Many arguments in favor of this proposition are discussed in the Environmental Impact Statement, but are then ignored in the lay-out of the Proposed Action. Areas to be preserved as natural habitat are determined solely on the basis of low timber productivity and to offer some protection for anadromous fish. Thereby areas of unaltered environment, rare ecosystems, and habitat for threatened and endangered species would be preserved only incidentally and without regard for the actual resource involved. For example, where are existing old-growth fauna residing and what efforts will be made to preserve those ecosystems?

The Planning Assumptions and Management Objectives and Constraints were either faulty (in whole or in part), or were not incorporated into the rationale in proposing the chosen alternative. We will address each one and would appreciate your comments on them.

Planning Assumptions

1. "The area can support several uses." It appears that this assumption was simply generally applied over the whole unit. Was it assumed that logging was one of these uses the area could support? Scientific and professional testimony as well as past evidence indicates that not only is this area unsuitable for logging, but if carried out, this use would preclude the other equally important forest resources including fisheries, water and soils. How do you account for this testimony by experts? Is it not a violation of the Multiple-Use Sustained Yield Act of 1960, if other relative forest resources, with equally important value, are precluded by the use of just one?

2. "There will be an increasing need to maintain a high quality environment." (emphasis added) The proposed action does not account for this assumption.

Survival Center EIS Response

Instead, the chosen alternative calls for logging on greater and greater acreages within the unit over time, thereby decreasing the quality of the environment.

3. "There will be an increasing demand for all types of outdoor recreation." (emphasis added) This assumption is very true, but was apparently mistakenly applied. Instead of looking at the recreation opportunities of the whole Siskiyou Forest, the state and the region, the Siskiyou planners are applying this assumption to only this planning unit and are trying to squeeze all types of recreation into it alone. How much land on the Siskiyou N.F. offers opportunities for primitive-wilderness type recreation? How many acres of classified wilderness exists in the state on forest lands, versus the remaining unprotected lands where logging will destroy the primitive recreation experience? By choosing an alternative including logging 60% of the roadless area, how are you accounting for the increasing demand for primitive-wilderness type recreation? Lastly, by logging 60% of this area, you are precluding the opportunity for expanding the proposed trail system in the unit and destroying the unique experience one can attain by climbing Grassy Knob and enjoying the views of the undisturbed canyons below and ocean afar.
4. "The national demand for wood products will increase." Without forgetting about the increasing demand for wilderness type recreation and the limited land base that provides those opportunities, how significant will be an annual allowable cut of 5.4 MMBF, when Forest Service projections estimate the total national demand for roundwood to be 15.2 Billion Cubic Feet in 1980 (The Outlook for Timber in the United States, 1973)? Would it not be in the best interest of the American people to save this unique coastal roadless area for primitive recreation and manage our forests for timber on other more productive lands where a dollar invested will bring a greater wood output return than it would in this unit?
5. "Elk River and Dry Creek will continue to provide important habitat for anadromous fish." Again, if this assumption were actually considered, the proposed action would not include logging. Why is logging proposed, when scientific-expert testimony and past evidence suggest that these important habitats will be threatened by those activities associated with timber management? The increasing value of natural spawning beds should be incorporated in this assumption:
Hatcheries supplement natural production and play an important role in fishery management, but they have not replaced natural production. Good hatchery sites in terms of available high-quality water supplies are limited. Therefore, the future of Oregon's salmon and trout resource depends on how our streams are protected. (Lantz, Guidelines for Stream Protection in Logging Operations, 1971)
Further evidence that lack of concern was given to this critically important resource is noted on page 75 where the Forest Service states that there will be a "moderate" degradative impact upon this resource, even though they recognize on page 19 the "rapidly increasing" value of the fisheries resource.

6. "Population levels of most unique, threatened and endangered floral and faunal species will continue to decline to the point of extinction as development progresses unless positive steps are taken to protect these species and their habitats." This assumption is true and yet is totally ignored in the Proposed Action. On page 41, the Forest Service states; Management practices will be designed to maintain or enhance carrying capacity and population levels of these species. (emphasis added)

If this statement is true and if the Siskiyou forest officers were actually concerned by the fate of these valuable floral and faunal species, then why do they propose logging when they recognize that 1) on page 75 of their own EIS, the habitat of these species will sustain a "high" negative impact and 2) on page 50, that the unit carrying capacity for some of these (unique, threatened or endangered species) will be substantially reduced, and lastly on page 52, that suitable habitat for these species will gradually decline by about 40% of that at present? It is obvious that the management practices proposed will not "maintain or enhance" the carrying capacity and population levels of these species. When will you learn that the best "management practices" you can provide for these species is to leave their old growth habitat undisturbed by prohibiting logging? As public land managers, it is outright misleading to make a statement like that above, concerning management practices, and yet support an alternative that cannot fulfill the stated goals.

7. "The risk of wildfire ignition will increase with improved access." If retained in its roadless state, risk of man-caused fire will be minimal.

8. "The scenic resource will continue to increase in importance and significance in Forest Service resource management." What consideration was given to this assumption? If it is true, then the Forest Service should retain the scenic beauty of the few remaining undisturbed natural forest systems. Does not Grassy Knob provide a unique coastal scenic environment within a mountainous forest setting that is deserving of scenic resource protection? Logging will destroy the undisturbed beauty of the area within the roadless area and will discourage many people from coming to the mountain and enjoying its present scenic resource.

9. "Forest and regional trends indicate the desirability of maintaining, upgrading or creating trails with a significant recreation potential." Will not logging preclude your opportunities to fulfill this important assumption? How many opportunities do we have to fulfill these goals on primitive lands of significant size versus those lands already cutover? Hiking in the unit is not limited to the creek beds. One of the most desirable features of this unit is to hike up to the top of Grassy Knob.

10. "The economy of the surrounding communities will continue to be heavily dependent upon the wood industry and on the National Forest for raw material."

While this may be somewhat true, it is an incomplete assumption. The economy is becoming less dependent on this resource, while becoming increasingly dependent upon the fishery and recreation resources. Based on the above assumption, the Proposed Action ignores future trends and economic goals of diversification of the economic base. The Grassy Knob and Red Cedar-Sunshine Roadless Area currently supplies economic recreational benefits to the local economy. Is it not true that they also provide significant opportunities for expanding that sector of the economy associated with fishing and hiking activities? What would be the present

and future impact on the local economy if the fisheries resource were degraded and the primitive recreation opportunities destroyed? This industry that has grown rapidly in recent years and may continue to do so over the long run, would be severely effected.

This assumption becomes less important than the Forest Service makes it out to be in their Proposed Action. On page 11, it states that the existing processing capacity for the dominant wood processing industry in the area has been estimated at approximately twice the sustained capacity of the land to produce the timber. This suggests then, that the unemployment problem is a result of excess capacity in the industry- a natural economic phenomena- not the lack of raw timber supply. Unemployment is also a factor of cyclical trends in the national economy, little of which has to do with local timber supply.

What consideration has been given to these factors above in weighing the importance of unemployment, local timber supply from Mt. Butler-Grassy Knob and diversification of the local economic base?

The following comments refer to specific Management Objectives and Constraints:

1. "Management activities must protect and, where practical, improve water quality for fisheries and other uses." Insufficient consideration was given to this objective. The Proposed Action as presented, will not accomplish this goal. This objective is again presented in reference to the Elk River on page 23, where it says: "...water quality in this river must be maintained or enhanced..." Directly in contradiction to this statement and the management objective, the Forest Service demonstrates that water quality will be degraded to a "moderate" degree. Is this "maintenance and enhancement" of water quality? Further evidence indicates that the Forest Service objectives cannot be accomplished. As the Wildlife Commission points out, the proposed streamside management policy will not protect the water resource. Given the major kind of mass erosion in the area- shallow rillslope and road-related debris avalanching- do you really believe that your proposed buffer strips will protect water quality, contrary to scientific and expert testimony? Furthermore, your proposed activities on Class III and IV streams will not prevent sludge outs, which will degrade water quality regardless of the proposed buffer zones.

4. "Intensive timber management activities must be designed to assure rapid regeneration and high utilization of the site."

If this area were devoted to intensive timber management, what assurance do we have that these practices, which would be necessary to protect other forest resources, will receive the necessary funds to be carried out? Even if these monies were allocated to the Forest Service in Region 6 for intensive management, it would be spent on more productive lands in other areas, besides Mt. Butler-Grassy Knob.

5. "Management activities must protect and improve the recreation potential of the area." As we already demonstrated, the Proposed Action is contrary to this stated objective.

6. "Management activities must protect the aesthetic qualities of the area as a whole from serious and particularly substantial long term degradation." (emphasis added) As a whole, the proposed action will not protect the area from degradation. The major mountainous-coastal type ecosystem of

the unit will be disrupted, water quality degraded, recreation opportunities diminished (especially those which depend on high aesthetic qualities), and old growth wildlife seriously impacted. Are not the irreversible impacts upon the wilderness qualities of the roadless area a substantial long term degradation?

7. "Management activities must protect and will wherever possible, enhance wildlife habitat." As we demonstrated previously, seriously impacting the old growth dependent wildlife habitat, the Proposed Action is contrary to this objective.

9. "The mix of management activities must efficiently use existing budget levels to produce a greater level of total public benefits." As we previously stated, existing budgets would be put to more profitable investments in other more productive, less marginal areas of both the Siskiyou National Forest and other national forests in Region 6.

Retaining the present undisturbed character of the unit would bring the greatest total public benefits.

It is stated on page 37 that the overall management objective for the unit is "to maximize the net benefits over time which society derives from the forest resources within (and related to) the Planning Unit." Even if the stated assumptions were correct and the given objectives fulfilled (which they are not), it is doubtful that the Proposed Action would maximize net public benefits over the long run. Granted this is difficult to evaluate, there is no doubt that the Proposed Action minimizes the chances for achieving long run maximization of net benefits.

In situations like this, where valuable natural resources are irreversibly destroyed, a conservative approach to resource management is the wisest policy in the interests of society. This is not to say that logging at an initially slow pace is the solution, but rather the solution is to retain the last vestiges of our natural forest lands for all the benefits they provide in their undisturbed state and then make the decision to enter these areas if future needs dictate the necessity. The reason for this conclusion is that a shift in the vantage point from which a plan is evaluated, say from one generation to the next, can result in a change in the "optimal" or "maximizing" plan, which however cannot be implemented if it is in a direction which has been foreclosed by earlier activity. Moreover, in this situation, there exists a significant difference of scientific and expert opinion regarding consequential environmental impacts of logging and hence a great amount of uncertainty.

The strategy of argument in favor of the Proposed Action seems to be "we have learned from past mistakes and we can now manage this area without having adverse impact on the fisheries resource." However, this reasoning is not sound and is contrary to scientific and public opinion.

Survival Center EIS Response

6.

First of all, scientists in the Forest Service, at universities, and other institutions simply do not have sufficient understanding of the pertinent environmental problems to say whether or not the Proposed Action will have adverse impacts on the fisheries resource. The problem has not been studied for the types of conditions present in the Planning Unit. As described in the EIS there are numerous examples of severely eroded hill slopes and heavily sedimented stream channels in areas surrounding the roadless area. Recently, several new energy-intensive logging and road construction methods have been developed. However, we have not had sufficient time to know if these measures are really effective in reducing the impact of roads and clear-cutting. To realistically assess environmental impacts, it is necessary to observe disturbed sites for at least 10 years -- through several severe storms and through the history of reduced rooting strength when stump roots are rotten and before root systems of new vegetation are well established. Until such long-term observations have been made, the new methods should be considered unproven. The only solid evidence of the ability of the Forest Service to manage land similar to the roadless areas is based on past performance. Where the Forest Service has managed lands with soils and slopes identical to conditions in the roadless area, they have done an unacceptably job.

Given that today we are not pressed by any national emergency and furthermore that we are dealing with extremely valuable natural resources, it is safe to say that the public is averse to risk, (public risk aversion has been dramatically expressed in recent public meetings regarding the Proposed Action). Consequently, there is a value in retaining an option to use the environment in a way that could otherwise be foreclosed -- another reason to hold back from this irreversible decision.

The most critical problem with irreversibly destroying natural ecosystems is that we thereby remove the basic material needed for understanding the functioning of natural ecosystems and the impacts of man's activities on them. At present, our understanding of both of these factors is extremely limited; and our ability to learn about them is being greatly impaired by the continued eradication of sizable areas of natural ecosystems.

In the analysis of environmental impacts of the Proposed Action, no evaluation is made of the loss of natural ecosystem. The research, aesthetic and recreational value of these resources will increase dramatically in the next several decades as the intensive timber management eradicates undisturbed sites in all surrounding areas.

If this natural area is subjected to the Proposed Action there would be no more areas to serve as geomorphic benchmarks (A.H. Fore, 1972; Natural Areas: Science, vol. 177, p. 396-400). So that we can compare the impacts of storm events on disturbed and undisturbed sites. It will no longer be possible to study natural wildlife habitats, the ecology of wildfire and other elements of the natural history of the area. These types of information are not simply academic curiosities, but rather they have great importance in the development of sound management

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Emergency employment appropriations bill provides some Forest Service roadbuilding funds, some of which may go to Siskiyou National Forest, if bill not vetoed by President". (emphasis added)

It is therefore obvious that the Proposed Action may not be carried out according to its existing presentation. If these monies are not appropriated, will the roadless area remain roadless?

Because of the need to minimize impact on the critical soils which occur throughout much of the Planning Unit, logging by helicopter methods is proposed for 29% of the volume to be extracted under the Proposed Action. However, we feel that it is unrealistic to expect that this amount of helicopter logging will be done in the area. The method is still in an experimental stage and it is proving to be very expensive both in terms of total cost (\$/MBF) and energy consumption (gal./MBF) (D.F. Dykstra, 1974; The Pansy Basin Study Comparing Yarding Rates and Costs for Helicopter, Balloon and Cable Systems; Loggers Handbook, vol. XXXIV.). Furthermore, it is likely that the costs of helicopter logging will increase dramatically in the next few years as fuel costs continue to climb. In 10 or 20 years will we be burning our limited petroleum resources to fly trees out of the forest? The proposed ridge-crest road system lay-out suggests that logs will be flown up to landings which would increase fuel consumption levels above those of experimental helicopter shows which have involved flying logs down to landings. The uncertain wind conditions in these coastal areas is likely to increase the delay times which are another critical factor limiting the economics of helicopter logging.

If helicopter logging is not economically feasible 10 or 20 years from now, a more extensive roading system will be needed to carry out the Proposed Action. This will result in further increase in soil erosion and an even greater impact on the fisheries resource.

Public and agency input to the planning process was virtually ignored. For example:

- 71% of the respondents "approved" or "strongly approved" Alternative 1 or a more restrictive version thereof
- 60% of the respondents "approved" or "strongly approved" Alternative 2 or a more restrictive version thereof
- 63% of the respondents "disapprove" or "strongly disapprove" of the proposed action.
- the Oregon State Fish Commission and the Oregon State Wildlife Commission favor Alternative 2

What the public and the key state agencies are telling the Forest Service is that the Proposed Action does not adequately protect the non-timber resources of the area. The recent fisheries directive from the Regional Office of the Forest Service and Oregon Wildlife Commission Memos (to the Siuslaw National Forest) are

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decisions on surrounding lands already committed to timber management, and hence are invaluable social assets that provide benefits in making future decisions.

There are several characteristics of this roadless area that distinguish it from other wilderness or otherwise unroaded forest areas which increase its scientific, aesthetic, educational and recreational value to society in its natural state. As surrounding areas are logged its uniqueness is increasing. The roadless area is the only large undisturbed natural drainage area in the Southern one-half of coastal Oregon. It is large enough to serve as adequate habitat for wildlife and contains relatively undisturbed natural spawning beds. Grassy Knob still records its own vegetation and fire history in stand age classes. Unlike the Kalmiopsis wilderness and adjoining roadless areas which are in the mixed conifer and mixed evergreen vegetation zones, Grassy Knob is in the Tsuga heterophylla zone (Franklin & Dyrness, Natural Vegetation of Oregon and Washington).

Alteration of the Grassy Knob roadless area, which contains unique, non-substitutable characteristics, including rare undisturbed ecosystems, will result in an irreversible adverse effect. Given there are no substitutes for the services this area provides for society, this irreplaceable environmental resource is an irreplaceable asset. On the one hand, timber extraction in Grassy Knob, would convert the natural environment into intermediate products to be processed as final consumptive goods. Conversely, retention of this natural environment would provide a flow of services that enter directly into the utility of users (be they scientists or recreationists) as final services. The effects of the first, while providing economic services, results in an action with irreversible consequences, and hence dynamic opportunity costs - costs which grow over time. Preservation, because it does not destroy or alter this non-reproducible asset, does not foreclose future options. Rather than creating increasing opportunity costs over time, it would provide increasingly valuable benefits to society.

It is apparent then, the Proposed Action doubtfully maximizes net public benefits over the long run. It is certain to say, by foreclosing future options, the Proposed Action minimizes all chances of achieving maximum net benefits (if net benefits are achieved at all).

On page 41, you state:
"Sound forest management in this Unit requires the use of appropriated funds for construction of main access roads".

What if these funds are not available? How can you base a plan on uncertain (and I must say necessary) funds? in a telegram from Senator Hatfield regarding this question of appropriated funds, he states:

"Not possible at this point to accurately indicate what funding will be provided for road construction (in the Siskiyou National Forest).

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9.

further "in house" and interagency evidence of past shortcoming of Forest Service management in this regard. Roads and logging units at Butler Creek and Panther Creek serve as on-the-ground evidence of critical conditions in the steep unstable soils in and adjacent to the Planning Unit.

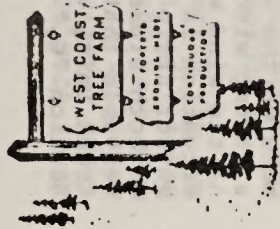
This sizeable area of natural ecosystem in Coastal S.W. Oregon should not be sacrificed on a promise of "we'll do better next time". The public response rejects the Proposed Action, asking instead for protection of resources other than timber in the roadless areas.

In conclusion, the Proposed Action is based on planning assumptions and objectives which are erroneous and ignored. Until the time when aesthetic, recreational, educational and scientific values of natural ecosystems are adequately protected in other areas of coastal S.W. Oregon, this last, sizable undisturbed area should be protected.

We propose that all of Dry Creek and the tributaries of Elk River (except Mt. Butler) be excluded from timber harvest. The drainage of Butler Creek should continue to be open to timber management, on an experimental basis. Large buffer strips should be included in this drainage so that water quality can recover and return to pre-loading conditions.

We are opposed to the Proposed Action and we support wilderness study for the Grassy Knob Roadless Area and Redcedar-Sunshine additions.

EIS Staff



INDUSTRIAL FORESTRY ASSOCIATION

SERVING FOREST OWNERS, LOGGERS, WOOD USERS
THROUGHOUT THE DOUGLAS FIR REGION

1220 S.W. COLUMBIA STREET
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May 22, 1975

Mr. William P. Ronayne, Supervisor
Siskiyou National Forest
P. O. Box 440
Grants Pass, OR 97526

Dear Mr. Ronayne:

We have thoroughly reviewed your Draft Environmental Impact Statement (DEIS) for the Mt. Butler-Dry Creek Planning Unit. We support, in the main, the Proposed Action and feel the planning team has compiled a rather complete document discussing environmental impacts of the action. We are pleased to note that you have recognized that economic and social impacts are part of the environment. We have long felt that inclusion and discussion of these vital aspects of the environment will benefit all special interests in viewing the overall picture.

There is one major area in the DEIS that we feel needs definite clarification. Our concern is with the comparison that is readily apparent by a reader of the values for fish and timber. First, we want to make it clear that we do not disagree with the proposition that the fisheries resource is very important. Many of the most ardent appreciators of the fisheries resource in the Northwest are among our constituents. We have always endorsed fisheries protection because we know that protection can be compatibly meshed with sound forest management activities. We believe you also hold this opinion based on your establishment of guidelines to provide for both forestry and fisheries activities.

However, as you well know, there are difficulties in establishing the gross or net values of the fisheries resource. We have studied all references you have used in developing the values presented on pages 15-23. As we said above, we do not question that fish are valuable, but we believe you should point out some of the difficulties and professional controversies surrounding both Brown's and Mathews' reports. Quoting from Mathews' 1970 study:

"... there are no traditional markets from which to determine the values that people place on fishing over and above their costs incurred."

"To measure net benefits, we, therefore, asked hypothetical evaluation questions, although it is a continuing controversial issue amongst economists, and others as well, whether appropriate values can be determined by such an approach." (emphasis added) (Mathews, Stephen B., and Gardner S. Brown. 1970. Economic evaluation of the 1967 sport salmon fisheries of Washington. Washington Department of Fisheries, Technical Report 2. page 8)

Letter No. 27

OREGON ENVIRONMENTAL COUNCIL COMMENTS
BUTLER DRY CREEK DRAFT ENVIRONMENTAL
IMPACT STATEMENT MAY 22, 1975

After having a professional forester and timber manager review this impact statement, we find it impossible to endorse the Forest Service's decision to construct roads and conduct timber removal operations in the Mt. Butler - Dry Creek Roadless Area. The Draft Environmental Impact Statement gives many reasons for leaving the area in its natural state, or conducting only a minor amount of logging, but offers virtually no justification for choosing intensive management of the timber resource. Thus, the report is blatantly biased toward timber management, while offering the public little data to support this choice.

11. How much would you be willing to sell your year's employment for?

Management in the unit has the vague objective "to maximize the net benefits over time which society derives from the forest resources within (and related to) the Planning Unit (benefits being measured in terms of both quantity and quality)." This is, of course, so obscure that anyone could interpret it in any way, but after reading the list of constraints which must be complied with in order to achieve the stated objective, one would certainly conclude that timber harvest would necessarily be a minor activity in the Unit. Indeed, the body of the EIS presents overwhelming evidence that the benefits to be derived from the unit are primarily fish, water, solitude, and probably of greatest value, an unaltered example to compare in the future with managed areas. Protection of environmental quality is described as a constraint, rather than an objective. However, the constraints are also referred to as "subobjectives" and as such, protection of environmental quality is stated as an objective.

The ZIS concludes that long term objectives-- protection of aesthetic qualities along Dry Creek and Elk River, protection of the fisheries resource, of water quality, of the soil resource, and of timber yield-- will not be appreciably reduced. Yet, little evidence is shown to support this contention. Indeed, experience indicates the opposite is usually the case.

The EIS states (page 50) that "destruction of the scenic qualities along either Dry Creek or Elk River will not occur." We seriously doubt this contention and believe instead that there is a great danger that the buffer strip in Dry Creek will blow down, possibly connecting clearcuts on opposite sides of the creek. It appears likely that when the timber on the east side of Section 29 and the east side of Section 28 are removed, the south wind whipping over those clearcuts will knock down the buffer strips in Section 28. A similar incident occurred three years ago along the North Fork Elk River (in Section 17 T 33S. R 12W. between Unit 7 of the Copper Mountain sale on the west and Unit 2 of the North Copper on the east). Even without a strong wind up on the landing, old growth fir snapped off like matchsticks as the wind would blast overhead and whip down into the canyon. The situation in Section 28 of Dry Creek appears similar. What happens to the buffer strip in the North Fork of Dry Creek in Section 22 when the timber on both sides of the ridge to the south of it is removed? It is quite conceivable that over a period of years, as more logging occurs in the Dry Creek Unit, there will be only isolated patches of the buffer strip remaining in Section "G," Fisheries, implies that the removal of a significant portion

Sincerely yours,

HEH:jm
cc: George Knowles, IFA

of the timber shading Dry Creek would cause the water temperature to rise beyond a point tolerable to salmonids, thereby reducing the Sixes River salmon run by 65%.

The statement is also made on page 50 that various quality control regulations and continuous water monitoring will assure that the proposed action will not adversely affect the long-term productivity of the fisheries resource to any substantial degree. However, the report fails to state how a situation causing unacceptable degradation of the water quality might be corrected. In many cases such situations cannot be easily remedied. For example, road cutback failures (which are commonplace in the Mt. Butler area) could easily trigger massive soil movement into any of the large streams, and there would not be a thing that could be done about it. Very little is known about the long term effects of the removal of timber on extremely steep, unstable soils. Will these soils, held together by tree roots, move downhill when the roots rot away after the trees are removed? The report does not consider this possibility. It simply states "Quality control regulations and techniques will prevent any significant loss of long-term soil productivity." What are these regulations and techniques?

The fact that siltation can destroy the spawning beds, coupled with the fact that nearly all of the soils in the unit are classified as "critical" would seem to indicate that tampering at all with the soil is very likely to result in a reduction in the spawning capacity of the streams in the Unit. The buffer strip of trees along Dry Creek is not going to stop a slide that occurs if a road slides out. The last paragraph on page 12 states that soils in the unit were mapped during the Cutbank Stability Reconnaissance Survey, but the results are not in this Draft. We suspect they would indicate that building roads almost anywhere in the Unit will be very risky. For all the knowledge displayed in this Draft, the Forest Service has shown itself to be too willing to risk road failures rather than admit they were wrong and try something else.

Contrary to the statement in the EIS (p. 50) that "The proposed action will provide a sustained, non-declining yield of timber," we fear that removal of the timber on such steep, shallow, unstable soils, exposing them to the full force of sunlight, wind and rain may in many cases make regeneration virtually impossible. Moreover, nutrient losses due to erosion and leaching when the barriers (debris) have been removed could cause irreparable loss of productive capacity over a term of many centuries.

It is most unfortunate that an exchange of the private land near the west end of the Unit was not effected before that land was logged. The proposal to exchange publically owned timbered land for recently logged off private land in the area strikes us as a poor deal for the taxpayer, but a certain windfall for the timber company.

The Forest Service proposes to construct the road system with appropriated funds, at a cost of approximately \$1.8 million. If they mean to construct the entire 30 mile road system for this amount, this calculates to \$60,000 per mile, a ridiculously low figure for this area. A 16 foot, full bench road on steep ground, requiring end-haul of all excavated material, costs

about \$200,000 per mile* or \$6 million total. How do they propose to acquire these funds? To our knowledge their efforts to obtain financing for construction of access roads in this area (Powers and Gold Beach Districts) have been largely unsuccessful, with the one exception of the Grassy Knob Road, a two lane blacktopped road intended for removal of the timber in the Mt. Butler-Dry Creek-Grassy Knob Area.

If appropriated funds are unavailable, what is the alternative--forget the whole thing, or sell enough timber initially to construct roads? After sufficient roads are in, the timber will presumably be removed by helicopter logging and skyline logging. We disagree with the contention (page 22) that "helicopter and skyline logging systems have shown that such disturbance can be minimized." We know of no sale with surface areas as fragile as these in which these systems have been used. We believe the Forest Service would be wise to wait for 10 years after completion of the Butcher's Gulch sale--which has similar conditions--before doing anything in the Mt. Butler-Dry Creek Unit. On the Powers and Gold Beach Districts helicopter logging has been confined to areas having a high volume of Port Orford cedar; these sites are generally characterized by richer, hence more stable soils.

Furthermore, there is no assurance that roads will not be built into helicopter sales, even though they have determined that a road would not be permissible into that particular sale. A case in point is the Wilbrite Helicopter sale sold on the Gold Beach District about two years ago. The Forest Service insisted that roads could not be built into the sale, and further insisted that only owners of Sikorsky S-64 helicopters could build a two mile road right into the center of the sale. Will the Forest Service allow construction of additional roads into helicopter sales if the helicopter owners convince them they are necessary? Additionally, helicopter yarding is so costly that its use nearly amounts to government subsidization of the timber removal.

Although skyline yarding is less costly, we doubt that this system will be feasible in much of the Dry Creek drainage, due to lack of adequate tailholds. Stumps are not well enough anchored in the rock mulch. Also the wide buffer strip along Dry Creek will preclude tailholding across the creek which will be necessary for adequate lift.

Uphill falling will no doubt reduce breakage, but the system has yet to be tried.

Data sources are not well defined. Statements of fact are made throughout the EIS with no reference to their source. The fisheries resource is the only sufficiently documented part of the statement.

* The Forest Service calculated the costs of the Butcher's Gulch Sale roads at between \$151,000 and \$261,000 per mile under former standards. This would be somewhat higher under current standards. This sale is adjacent to the Mt. Butler area.

We would, however, question one statement made in the Fisheries section. On page 19 the assumption is made that, since 22% of the Elk River watershed originates in the planning unit, one must conclude, lacking further evidence, that 22% of the fisheries value will also originate in the Unit. However, our expert in the area informs us that salmon do not spawn more than two or three miles above Butler Creek, and a significant portion of the Elk River watershed originates above there. Nor do many fish spawn in Panther Creek, and only a moderate number in Butler Creek. Therefore, the percentage of fish born in the Unit's streams is likely to be far higher than the proportion of water that Unit contributes to the Elk.

Apparently most of the data concerning the other resources came from Forest Service personnel through field observation and studies of aerial photographs, and are sketchy at best. Much of the data are based on statistics which are too variable to be considered of much relevance, especially as pertaining to employment. However, it is probably impossible to increase the accuracy of much of the data with the present statistics available. One should simply not give too much credence to such evidence.

Planning is apparently not being done on the basis of land capability units, other than that buffer strips are being left along Class I and II streams to attempt to protect the fisheries and water resources. Habitat typing was not done. Soil types have been identified, and the risks of timber management on the various types has been mentioned, but the promised constraints seem inadequate in soils described as having high to severe erosion potential and a high degree of instability.

Watersheds and related data are not specifically identified, although reference is made to a study by the Pacific Northwest River Basins Commission indicating the volume of runoff from the Unit to the Elk and Sixes Rivers. However, the report states that the Unit receives 85-90 inches of precipitation annually, whereas the average annual precipitation measured over the past four years, at the Elk River Hatchery (Port Orford Station 5 East) is 135 inches. Thus the accuracy of figures relating to watershed is doubtful.

Siltation monitoring devices are currently being used in streams coming from the Unit. No mention is made of plant and animal species (other than anadromous fish) inhabiting the streams. Water quality standards are described as "considerably more stringent than standards currently applicable to either the Elk or Sixes Rivers". However, the FIS states that these standards will be adhered to "except for certain short-term activities which may be specifically authorized, and which are necessary to accomplish legitimate uses or activities where turbidities (or temperatures) in excess of this standard are unavoidable." Just what these activities might be, how short their term might be, what is considered a legitimate use, who might authorize relaxation of the standards, and to what degree the standards might be relaxed are not mentioned. Existing water uses are not documented. For example, ranchers along the Elk and Sixes Rivers draw considerable water for surface irrigation. A reduction in flow will cause acute problems between the fisheries resource and cattle and sheep raising. No mention is made of this fact, not is any consideration given to possible increased demands for water.

Furthermore, higher water levels in winter, due to increased runoff caused by timber removal will no doubt cause increased bank erosion along farm lands. No mention is made of this loss, even though it is of increasing concern to ranchers.

No presentation is made of the data used to determine the total volume of the timber in the Unit, nor is any explanation given of how the allowable cut was determined, yet timber types are listed with volumes to the nearest one thousand board feet! A determination this accurate would require very intensive cruising. However, the only mention of cruising states that random traverses were made through the Unit. Were these methods statistically valid? Were they actually at random? The low site index and very low basal area found in the Unit, combined with extremely steep, rocky, unstable soils suggest that the possibilities for reforestation are quite limited. The FIS admission that these factors may cause "regeneration problems" appears to be an understatement. Reforestation of south slopes may well be impossible. If natural seeding must be relied on, it will undoubtedly prove very slow and spotty, resulting in a 200 year rotation.

We are unaware of any Forest Service experiments with container-grown trees. Apparently these are especially convenient for use in sites where there is not adequate space to plant a tree by the usual method, but we fail to understand why they would grow in rock mulch where a regular seedling would not. We would urge the Forest Service to wait until they have figured out how to reforest the first clearcut unit on the Butler Creek Road before embarking on experiments in Dry Creek.

Data given on timber values indicate an annual cut of 5.4 million board feet having a gross value of \$1,188,000 or \$220/". This sounds reasonable. The net value of the stumpage (presumably deducting harvesting cost) is \$328,000 or \$60/" leaving \$160/" for harvesting. We assume this includes road construction costs, as it should. Skyline logging costs on the average about \$80/" and helicopter logging about \$120/". Using the Forest Service estimate of about 71% skyline and 29% counter logging, this figures out at \$92 for logging, leaving \$68/" for roads. At \$6 million (our estimate) for construction of 30 miles of road, it should take \$8 million board feet to pay for the road, or at 5.4 million per year, 16 years. At that point, the taxpayer (who paid for the road) will begin realizing a return on the investment. Or, if the roads are not built on access money, how much timber will be harvested annually to build enough road to reach it. This possibility is not considered in the FIS.

However, presumably the road would not be constructed at once, but might span a period of 30 years. If ten miles were constructed the first year, and logging was conducted at a rate of 5.4 million per year, a profit would be realized by the sixth year, and a total profit of \$1,672,000 would be made in ten years ($54M \times \$68/" = \$3,672,000 - \$2,000,000$ road construction cost) or \$167,000 per year. The county receives as its share 25% of this, or \$42,000 per year, a paltry sum for a county receiving an annual \$2.2 million in Federal timber receipts (page 9). The FIS calculates about twice the annual receipts than we do, due to the ridiculously low road construction estimates in the report.

All of this assumes that the planned 30 miles of road will be adequate. This appears doubtful, as the little map showing proposed road locations indicates timber harvest over distances in excess of one mile from the nearest road. A Skagit BN-99 yarder is capable of yarding 1 1/2 mile, and a Sikorsky S-64 copter, although it has the physical capacity to yard over any distance, apparently cannot economically fly much further than 1/2 mile. Daily volume is extremely critical in helicopter yarding. A copter flying level or downhill over a 1/2 mile span can move 200MM board feet per day for about \$100 per M. However, if he has to exceed that distance or fly uphill and reduces his daily volume to 100MM, his yarding cost is \$200/M, equaling the value of the timber. The conclusion then is that the timber values barely seem to equal the costs of removal, and in all probability the costs of removal will far exceed the Forest Service's estimate.

Although there is no range land within the Unit, as has been previously noted, there are ranches adjacent to the Unit which depend upon water from the Unit for pasture irrigation. Any reduction in summer flow may cause serious erosion to these pastures.

While the report nares most mammal species, both game and non-game, found in the area, it stresses the fact that harvesting timber will bring about an increase in rare species, while minimizing the detrimental effect on many non-game species. Many bird species are found only in old growth timber, a fact not even mentioned in the EIS.

The statement admits that the suitable habitat for endangered species, notably the spotted owl, will be greatly reduced. It does not point out, however, that in a few decades there will be no habitat for this species or many other species requiring stands of old growth timber anywhere in the region except for a few areas set aside from logging. The intangible value of preserving the spotted owl is given virtually no consideration in comparison to the dollar value of the timber. Furthermore, the bird's habitat is not clearly defined at all. They may be found only in Dry Creek, as this species lives only in undisturbed canyons and Elk River no longer meets this criteria. Will the buffer strip along Dry Creek (even if it does not blow down) remain satisfactorily undisturbed? Would an owl hearing log machinery noises in an adjacent clearcut fail to reproduce? No mention is made of any effort to protect the species presumably because, unlike anadromous fish, it has no dollar value.

The Unit is described as having a low rating for the Roadless Area Review and Evaluation (PARE), but no reason is given for this, nor is any explanation of the rating system given. It would be interesting to know more about this process. Who makes the evaluations? What are the criteria? How many points did other areas receive? No feeling for the philosophical or spiritual value of the wilderness of the area is discussed. This is one of the most important reasons for leaving it alone. The observation is made (page 57) that the Forest Service considers the quality of wilderness within the Unit to be "not better than mediocre." The report asserts that "almost all of the 362 citizen innuents received tend to concur with the above conclusions." This assertion strains credibility, unless one assures that every citizen who did not actually praise the Unit's wilderness qualities apparently considered them mediocre. We do not. The quality of wilderness here is unique, as most wilderness areas appear to

have been left because the timber was not worth harvesting, rather than that they were so rugged and inhospitable that they were regarded as too "wild" to manage.

Recreational use seems to be fairly well covered, although there is no discussion of the advantage of leaving the Unit strictly alone, with no hiker trails or developed campsites. Also there is no mention of the possibility of restricting a trail to foot traffic only or of constructing in it such a manner that trail bike traffic would be precluded. Road closures are considered for fire protection, but not for limiting off-road vehicles use.

The first three alternatives appear, without close scrutiny, to be quite reasonable. The fourth, offering very limited protection to Dry Creek seems unreasonable in view of the fact that this stream is the spawning bed for about 70% of the Sixes River salmon run. Nor does it offer protection for Anvil Creek, of critical importance to the Elk River salmon hatchery. The fifth, offering no protection whatsoever for any streams, including the Elk River, is entirely unreasonable. Alternatives four and five are not consistent with the stated objectives (referred to as "subobjectives" on page 35), hence should not be considered as possibilities for achieving these objectives. They would sacrifice all other uses in the Unit for one use only--timber harvesting. Alternative 6, while appearing to maintain the status quo, contains the thinly veiled threat of haphazard exploitation of the Unit.

Alternative one would maintain the status quo. Another alternative could have been made, which although we would not endorse, would be more reasonable than alternative three, and that would have been to take the entire area south of the main east-west ridge a fisheries zone, while treating the area north of the ridge as in Alternative Three. This would offer Anvil Creek and Rock Creek complete protection, while having a relatively small impact on the timber harvest as that slope has a lower per-acre volume than the north slope.

It appears then, that there are only three alternatives which could be considered as possibly meeting the stated objectives and subobjectives. Impacts for each alternative seem to be reasonably expressed. However, through erroneous statistical manipulation, the conclusion is drawn that adoption of Alternative One would cause the loss of between 35 and 73 jobs in western Oregon. This is ridiculous. Employment is primarily dependent upon market conditions rather than timber volume. True, it takes a minimum volume of timber to keep a mill operating, but the loss of 3.4 million board feet divided by the total volume used by the companies that bid on timber in this area would have virtually no effect on the number employed by these mills. If a mill had reduced its inventory of timber under contract to 3.4 million board feet, it would be out of business anyway.

With regard to soil erosion, it is stated that "the primary change would be that little, if any accelerated soil erosion would occur in the Dry Creek drainages" is Alternative 3 is adopted rather than 1. The Forest Service is much more confident than we in the ability of the buffer strips in Anvil and Rock Creeks to prevent soil from entering these stream-



Letter No. 28

WESTERN FOREST INDUSTRIES ASSOCIATION

1500 S. W. TAYLOR STREET · PORTLAND, OREGON 97205

May 22, 1975

Mr. William Ronayne
Supervisor
Siskiyou National Forest
Grants Pass, Oregon

Dear Mr. Ronayne:

We have completed a review of the draft environmental impact statement on the Mt. Butler-Dry Creek Planning Unit. In our opinion, it is inadequate and does not conform to the requirements of the National Environmental Policy Act. It furnishes mainly conclusory statements with little supporting data or references to studies that may be available.

It contains misleading information on the relative importance of the fisheries resource as compared to timber and other uses. For example, on page 3 the value of the timber from the unit is compared with the value of the fish from the unit and unknown adjacent areas.

The history of the planning unit, for example, on pages 7 and 8 shows that fires and floods were the history of this area even though it remained essentially roadless. Yet, in Dry Creek, which has few roads in it, "During the last 50 years as much as 4 to 5 feet of streambed gravel has been added according to one source" (un-named). Based on statements such as that, the draft statement then concludes that logging will have heavy adverse effects, particularly if intensive forestry is practiced. We had always thought that under intensive management and careful supervision and administration by the Forest Service, adverse effects could be minimized to at least where the effects were neither drastic or irreversible and favorable benefits outweighed them.

This draft concludes that intensive forestry is probably destructive to anadromous fish. There is no factual evidence to indicate this. The comparative data for the proposed action, pages 73-76 of your draft, is based on conclusory statements which are not verified by studies and factual data.

It is concluded, as throughout the EIS, that "For most resources, the degree of protection varies little amongst these alternatives. However, the level of socio-economic benefits do vary widely." This is quite untrue. As regards the latter, we are considering a reduction in the allowable cut of 3.4 million board feet annually. As the allowable cut on the Powers and Cold Beach Districts is in excess of 100 million board feet, this represents a loss of about 3% in timber volume, and very little in stumpage receipts as the cost of road construction and logging will consume most of this value.

Alternative Two uses the same erroneous statistics to show a loss of local jobs if the alternative is adopted, and also asserts that there would be no more adverse environmental impact under the proposed action that there would be under this alternative. This alternative also assures a uniform dispersal of spotted owls throughout the Unit rather than recognizing their preference for canyons. It also claims a major adverse impact on the local socio-economic environment (due to a 2-1/2 per cent loss in timber volume).

In conclusion, the decision to log the Mt. Butler-Dry Creek Roadless Area was made several years ago, when money became available to extend and improve Grassy Knob Road. In reviewing this statement one realizes that there will be many adverse consequences if the area is logged--consequences which are probably never realized by the Forest Service when making the original decision. If the final decision is made not to log the area the Grassy Knob Road may be held up as a mute testimony to yet another government foible. But, much more important, it will symbolize man's increasing awareness of his impact on the environment, and his willingness to make sacrifices to protect the environment from his never ending pursuit of progress.

OREGON ENVIRONMENTAL COUNCIL
2637 S.W. Water Avenue
Portland, Oregon 97201
(503) 222-1963

JR:alh

Georgia-Pacific Corporation

P.O. Box 869 Coos Bay, Oregon 97420 503/269-1171

Mr. William Ronayne
May 22, 1975
Page Two

In discussing adverse impacts on pages 48 and 49, socio-economic impacts are ignored. NEPA is aimed at the human environment. That includes a man's ability to maintain a secure family unit, something that mill workers cannot do if the log supply is cut down for reasons that are less than totally compelling. The rejection of intensive forestry is not in keeping with the intent of Congress, in particular if we are to meet the nation's Congressionally-declared housing goals.

Finally, we find it astonishing that the Forest Service believes itself to be incompetent to administer intensive forestry in conjunction with anadromous fish waters. We had thought that the goal of managing a forest for the perpetual production of the wood needed by the American people could be accomplished simultaneously with the protection and, indeed, the expansion of the fish resource. Both timber and fish are important. Competent management could serve them both.

For these reasons we believe that the draft is inadequate. It should be recalled and replaced by a draft that more nearly comports with NEPA's requirements.

Very truly yours,

John A. Davenport
John A. Davenport

June 9, 1975

Mr. William P. Ronayne
Forest Supervisor, Siskiyou National Forest
P. O. Box 440
Grants Pass, Oregon 97526

Re: U. S. D. A. Draft Environmental Statement on the Land
Use Plan for the Mt. Butler-Dry Creek Planning Unit

Dear Mr. Ronayne:

This letter is to inform you that Georgia-Pacific Corporation is in agreement with the U.S. Forest Service's decision to accept Alternative 3 as the best plan for the Mt. Butler - Dry Creek Planning Unit. However, we do not completely agree with the idea of removing lands from the multiple-use concept. But, it would appear that in this specific case, Alternative 3 combines the most desirable aspects of balancing the existing natural resources to the socio-economic values with a minimum of environmental impact.

We would request the U. S. Forest Service to periodically review this Proposed Action, if accepted. If it was found at a later date that more timber could be harvested without the loss of the other resource values, then this should be done. It makes little sense to us to determine a strict allowable cut now, when, in the future, more timber production might well be feasible and desirable.

We have had a most difficult time locating a draft environmental statement on this planning unit for our use. We would request that any future materials regarding this planning unit, or any others developed by the Siskiyou National Forest, be forwarded to us for review and, if appropriate, comment.

Georgia-Pacific appreciates the opportunity to comment on the Mt. Butler-Dry Creek Planning Unit Draft Environmental Statement. Hopefully, our comments will provide some support to the U. S. Forest Service on their Proposed Action.

Sincerely,

D. L. Mobley

D. L. Mobley
Director, Western Timber
and Forest Operations

DLM/d

Info	✓
Action	✓
Dist. D	
Supv.	
T. H.	
A. O.	
Leads	
Engr.	
Fire	
Wildlife	✓
SIE	✓
ADU	
JUN 26 1975	
B & F	
Person	
Reserve	
Ad. Serv.	
Conting.	
Purvisg	
Zone I	
Zone II	

W/ ——— end.

SOCIETY OF AMERICAN FORESTERS



COLUMBIA RIVER SECTION
Coos

Info	✓
Action	✓
Distrib.	✓
Supv.	✓
T. M.	✓
A. S.	✓
Lands	✓
Engr.	✓
Fire	✓
Winched	✓
COLUMBIA RIVER SECTION	
June 30 1975	
CHAP. 87	
B & F	✓
Parant	✓
Reserve	✓
Pur. H. G.	✓
Zona I	✓
Zona II	✓

June 20, 1975

Dear Sirs,

The Coos Chapter of The Society of American Foresters supports the professional judgement of the Forest Service personnel who prepared the environmental statement for the Mt. Butler-Dry Creek Management Unit.

We feel the "proposed action" is a good compromise between timber management use and fisheries, wildlife and recreational use. Adoption of the "proposed action" should be dependant upon the following consideration; The fisheries and recreation area in the Dry Creek drainage is more than adequate if there is indeed a valid need for recreation in the area. If fisheries is the only concern, then we feel that an adequate buffer strip is one which meets Forest Service specifications. Further compromise of the "proposed action" would not be in the best interests of the local economy and intensive forest management for long term timber yield.

The enclosed list indicates those present at a combined

SOCIETY OF AMERICAN FORESTERS



COLUMBIA RIVER SECTION
Coos Chapter

meeting of the Coos Chapter of The Society of American Foresters and the Coos Chapter of The Associated Oregon Loggers who favor the multiple use concept of the Mt. Butler-Dry Creek Management Unit.

Sincerely,

David J. Messerle

David J. Messerle

Chapter Delegate

Combined meeting Society of American
Foresters & Associated Oregon Loggers,
Inc., May 23, 1975, Coos Bay, Oregon.

Signatures of those in favor of
multiple use management on the
Dry Creek study area near
Port-Orford, Oregon.

Russell E. Stungner
Ray G. Young
John G. Garland
Walter L. Howard.

Rep. Allison
Wayne B. Reed

Dud Long
C. L. Hoff
M. H. Graham

R. C. Adamek

James Van
Wendy E. Schuler
Steve Whitcomb

James M. Clark
Timothy J. Ford

Thomas J. Moore
Donald W. Berglund
George W. White
Craig M. Williams

Clarence Jensen
W. Harker
B. J. Wootley
Bill Leonard
David J. Wessela
A. J. Kanda
Ernest F. Crane
Don Robertson
D. J. B. B. B. B.
Mark L. Crossen
Tom V. V. V.
Thompson S. Ellington
John D. Wittmeyer
Robert E. Lawrence
James H. B. B.
Stephen O. Waite
Michael J. Kennel

Letter No. 31

COQUILLE CHAMBER OF COMMERCE

P. O. Box 711

Phone 396-3414

Coquille

Oregon

June 23, 1975

Mr. Harold Simes
Powers District Ranger
Siskiyou National Forest
Powers, Oregon 97466

Dear Mr. Simes:

The Coquille Chamber endorses the U.S. Forest Service proposal for the Mt. Butler-Dry Creek area. Maintaining stability as it relates to this fisheries-wildlife area is certainly as important as providing adequate merchantable timber for the south coast economic base.

Continual awareness to proper "intensive management technique" is in our opinion the key to the environmental/economic success of your land area responsibilities.

Very truly yours,

Michael Dunfee
Michael Dunfee, PRESIDENT
Chamber of Commerce
Coquille, Oregon

Info	Adm.	Ext.	Gen.	Inv.	Lab.	Legal	Plan.	Rec.	Spec.	Trng.	Off.	Comm.	Advis.	Other
SISKIYOU														
JUL 23 1975														
Info	Adm.	Ext.	Gen.	Inv.	Lab.	Legal	Plan.	Rec.	Spec.	Trng.	Off.	Comm.	Advis.	Other
SISKIYOU														
JUL 23 1975														
Info	Adm.	Ext.	Gen.	Inv.	Lab.	Legal	Plan.	Rec.	Spec.	Trng.	Off.	Comm.	Advis.	Other
SISKIYOU														
JUL 23 1975														

WJH:mlv
WJH:mlv

Letter No. 32

NORTH BEND

IN THE HEART OF THE GOLD COAST OF OREGON

Chamber of Commerce

LOCATED BY THE BRIDGE

TELEPHONE 756-4711

NORTH BEND, OREGON 97459

Info	Adm.	Ext.	Gen.	Inv.	Lab.	Legal	Plan.	Rec.	Spec.	Trng.	Off.	Comm.	Advis.	Other
SISKIYOU														
JUL 23 1975														
Info	Adm.	Ext.	Gen.	Inv.	Lab.	Legal	Plan.	Rec.	Spec.	Trng.	Off.	Comm.	Advis.	Other
SISKIYOU														
JUL 23 1975														

William P. Ronayne, Forest Supervisor
Siskiyou National Forest
P.O. Box 440
Grants Pass, Oregon 97526

Dear Mr. Ronayne:

The North Bend Chamber of Commerce Board of Directors approved the enclosed resolution on June 20, 1975. Our group is very concerned and interested in land use planning which will affect our area.

We hope that our opinions and suggestions will be of some assistance to the Forest Service in reaching final decisions on the land use plan for the Mt. Butler-Dry Creek area.

We would also ask that you keep us informed of future action pertaining to land use planning. We would appreciate copies of any environmental impact statements which affect the development of the coastal area.

Thank you also for the information you have sent in the past.

Sincerely,

Paul F. Westphal
Paul Westphal, President
NORTH BEND CHAMBER OF COMMERCE

NORTHWEST STEELHEADERS COUNCIL of TROUT UNLIMITED

June 24, 1975

Mr. William P. Ronayne
Siskiyou National Forest
P.O. Box 440
Grants Pass, Oregon 97526

Dear Sir,

About a month ago I sent you a letter expressing our organizations opposition to the D.E.I.S. of the Butler Dry Creek. It was a short statement and did not give you any explicit reasons of why we oppose this plan. Therefore, since the deadline has been extended, I would like to take this opportunity to discuss the plan further.

Our opposition stems from the following:
1. The draft Environmental Statement has not adequately given protection to the fish and wildlife resource of this area. 2. The erosion in this area would damage the water quality. 3. We want to see this area remain roadless and untouched.

The surrounding area of the Butler Dry Creek area has been logged very vastly over the past several years. This damage has been hard hitting on both Fish and Wildlife Resources. It would be unfortunate if The Butler Dry Creek Area was to be destroyed in this same way.

Dry Creek is one of the last remaining tributaries of the Sixes River that still produces a large number of Salmon, Trout, and Steelhead. It is a very important tributary which should be left in its natural state. If logging has to be done why not use Helicopters and do selective logging?

Yours for the Fishery,

Mike Saltee
Mike Saltee
President of Oregon
Northwest Steelheaders
Council of Trout Unlimited



RESOLUTION

Supporting U.S. Forest Service "Proposed Action" for Mt. Butler - Dry Creek Planning Unit

WHEREAS,

the Congress of the United States decreed in 1897 that "No National Forest shall be established except to improve and protect the forest within the boundaries, or for the purpose of securing favorable condition of water flows, and to furnish a continuous supply of timber for the use and necessities of the citizens of the United States.";

WHEREAS,

U.S. Forest Service is a dedicated group of foresters charged with the management of forest resources within the Siskiyou National Forest, Pacific Northwest Region;

WHEREAS,

U.S. Forest Service Resource Management has presented a series of alternatives for the Mt. Butler-Dry Creek Planning Unit for public review and response;

WHEREAS,

North Bend Chamber of Commerce has made a detailed review of the forest resource management alternatives for the Mt. Butler - Dry Creek Planning Unit;

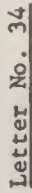
NOW THEREFORE, BE IT RESOLVED that

North Bend Chamber of Commerce endorses U.S. Forest Service "Proposed Action" forest resource management plan for the Mt. Butler - Dry Creek Planning Unit.

North Bend Chamber of Commerce, further urges Forest Service staff to continue using their professional skills to assure the multiple use benefits which flow from a well managed forest -- stable employment, revenues for local government, timber resources, forest scenery, water quality, wildlife habitat and recreation opportunities.

Info	✓
Action	✓
Dist. D	✓
Supv.	✓
T. X.	✓
A. O.	✓
Leads	✓
Case	✓
File	✓
Washed	✓
SISKIYOU	
JUN 26 1975	
E & F	
Permit	
Notice	
P. L. W.	
Ch. I	
P. L. W.	
Zone I	
Zone II	

Mike Saltee
6/11/75



COOS HEAD TIMBER COMPANY

P. O. BOX 780 • 00088 SAY, OREGON 97420 • PHONE 803-287-2193

June 27, 1975

RE: Mt. Butler-Dry Creek
Draft Environmental

U. S. Forest Service
Siskiyou National Forest
P.O. Box 440
Grants Pass, Oregon 97526

Attention: Mr. Bill Ronayne

Dear Mr. Ronayne:

I have been told that the U.S.F.S. after soliciting a response on the management of the Dry Creek watershed, is leaning toward preservation of this entire area. This has to be a poor decision for the public in general.

We are a nation of monetary, human and natural resources. Our culture and our standard of living are predicated on the wise and complete use of these resources. The timber, land and water resources in the Dry Creek area should be managed to derive the fullest possible benefit from this area. I maintain that a well balanced timber management program in this area can be achieved without adversely affecting other land or water resources.

Recent developments in resource management allow the forest management specialist to accurately predict the effect of a clear-cut on stream temperatures. New logging techniques allow timber to be snatched from the hillside with little effect on the ground. Engineering and road building techniques allow us to build roads with little danger of slides and sheet erosion. The Forest Service has men that are specialists in each one of these management areas. I maintain that the time has come to stop setting aside masses of land for the preservationist. The time has come for the Forest Service to predict that they can actively manage these resources for the benefit of all, and then to perform.

I feel that the Forest Service can effectively manage the Dry Creek drainage under the multiple use concept with the primary emphasis on timber resources. Setting aside 8,600 acres of a 22,100 acre prime, timber-growing area is a very meek approach in a period of

[illegible]

U. S. Forest Service
June 27, 1975

time when the nation is faced with a shrinking timber base and housing shortage. At a time when we need an intensive forest management program, we appear to be setting aside areas that could produce timber without adversely affecting other resource interests.

Under no circumstance should more than 8,600 acres be set aside for other than timber management.

Sincerely,

COOS HEAD TIMBER COMPANY

Andrew H. Brown

Rodney F. Greene, Forest Engineer

RFG:ej

Letter No. 35

COOS BAY AREA CHAMBER OF COMMERCE

P. O. BOX 210 • PHONE 267-6519 • COOS BAY, OREGON 97430

June 27, 1975

File	✓
Action	✓
Dispt. D	
Supv.	
T. M.	
A. S.	
Lands	
Engt.	
Fire	
Wildlife	✓
Planning	
Conservation	
Public	
Zone I	
Zone II	

JUN 30 1975

B & F
Person
Reserve
A. S. S. V.
Conserv.
Public
Zone I
Zone II

428 JUN 30 1975

Wm. P. Ronayne, Forest Supervisor
Siskiyou National Forest
P. O. Box 440
Grants Pass, Oregon 97526

Dear Mr. Ronayne:

The Coos Bay Chamber of Commerce is pleased to send the enclosed Resolution. We have supported the Forest Service proposed action in the Mt. Butler-Dry Creek Planning Unit within the Siskiyou National Forest.

The Coos Bay Chamber did not receive a copy of the Environmental Impact Statement on the Mt. Butler Planning Unit. In the future we would like to be placed on the mailing list so that when any Environmental Impact Statements such as this are published, we will have an opportunity to review and respond to them.

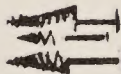
After the fire season is over and the work schedule slacks off a bit, we would enjoy having you come over to Coos Bay and present a program on the Forest Service. In conjunction with this program, we would like to have a meeting between you and some of your staff and the Forestry Committee of the Chamber of Commerce to discuss how the Chamber of Commerce of Coos Bay could assist the Forest Service in the future.

Sincerely,

David R. Quick

David R. Quick, President
COOS BAY AREA CHAMBER OF COMMERCE

DRQ/hc
Enc. 1



COOS BAY AREA CHAMBER OF COMMERCE

RESOLUTION

IN SUPPORT OF

U. S. FOREST SERVICE 'PROPOSED ACTION' FOR MANAGEMENT

OF

MT. BUTLER - DRY CREEK PLANNING UNIT

WHEREAS, there is a growing concern over this country's ability to continue to meet increasing levels of consumption of wood products without substantial increases in timber prices;

WHEREAS, the major aim of the 1897 Organic Act of the Forest Service was to assure future timber supplies;

WHEREAS, Siskiyou National Forest management staff proposes a balanced land use management plan for the Mt. Butler-Dry Creek planning unit;

WHEREAS, the economies of Southwestern Oregon communities are dependent on timber harvested from public lands managed by the Forest Service;

WHEREAS, timber resources from the Siskiyou National Forest represents an integral part of the wood fibre tributary to the Port of Coos Bay;

WHEREAS, the Coos Bay Area Chamber of Commerce has reviewed the Forest Service's 'proposed action' for the Mt. Butler-Dry Creek planning unit and found it to be a reasonable approach to forest management that will yield significant quantities of wood fibre without adversely affecting the fish and wildlife habitat within the planning unit;

NOW THEREFORE BE IT RESOLVED THAT the Coos Bay Area Chamber of Commerce supports the U. S. Forest Service's 'Proposed Action' management plan for the Mt. Butler-Dry Creek planning unit in the Siskiyou National Forest.

Action of the Board of Directors on June 19th, 1975

COOS BAY AREA CHAMBER OF COMMERCE

Myrtle Point Chamber of Commerce

IN THE HEART OF THE FAMOUS MYRTLEWOODS

Myrtle Point, Oregon

June 30, 1975

William Ronayne
Forest Supervisor
Siskiyou National Forest
P.O. Box 440
Grants Pass, Oregon

Dear Sir:

Enclosed is a resolution approved by the Myrtle Point Chamber of Commerce at a recent meeting concerning Mt. Butler-Dry Creek 'proposed-action'.

The Chamber would appreciate any materials you might have for review.

Also the chamber would appreciate a visit from a member or members or the Forest Service to pre- send a program on forest service practices at any meeting. The chamber meets the first and third Non- day at 12 noon at the China Sails in Myrtle Point. You may call Shirley Francis, secretary, 572-2717, Myrtle Point Herald Office, in Myrtle Point, Ore.

Sincerely,

Shirley Francis, secy.
Myrtle Point Chamber of Commerce

cc: Harold Simes
Fowers District Office
Fowers, Oregon

IN THE HEART OF THE FAMOUS MYRTLEWOODS

Myrtle Point, Oregon

RESOLUTION ON MT. BUTLER-DRY CREEK

- Whereas 1- Forest Service has been given the responsibility for managing the Siskiyou National Forest;
- Whereas 2- Forest Service has proposed that Mt. Butler-Dry Creek planning unit be managed in accordance with their 'proposed action';

Whereas 3-The Myrtle Point Chamber of Commerce has reviewed 'proposed action' and found it to be a practical management plan for the planning unit;

Now, therefore be it resolved:

The Myrtle Point Chamber of Commerce endorses the Forest Service 'proposed action' as being a plan that will meet the needs of the people in Southwestern Oregon and best contribute to the multiple benefits which flow from well managed forests-jobs, county revenues, water, scenery and wildlife habitat.

Info	
Action	X
Distib.	D
Supv.	
T. M.	
A. O.	
Lands	
Engr.	
Fire	
Wished	✓
SISKIYOU	
JUL 2 1975	
B & F	
Permit	
Harbor	
P. S. Serv.	
Contg.	
Adm.	
Rec. M.	
Cont. M.	

427 pax/nd
each

C. C. D.
ECONOMIC IMPROVEMENT ASSOCIATION

830 S. E. DOUGLAS AVENUE • COOS - CURRY - DOUGLAS • ROSEBURG, OREGON 97470 • TELEPHONE (503) 672-4728

August 19, 1975

Mr. William P. Ronayne, Forest Supervisor
Siskiyou National Forest
P.O. Box 440
Grants Pass, Oregon 97526

Dear Mr. Ronayne:

I want to take this opportunity to submit this response to the Draft Environmental Statement: Land Use Plan for the Mt. Butler-Dry Creek Planning Unit. I appreciate this opportunity to provide input and hope that this response can be of assistance to you and your staff in the development of the Final Statement.

The primary concerns of CCD relative to the land use plan for the Unit are with the socio-economic impacts which the plan will have locally in Curry County, in the South Coast area (Coos and Curry Counties), and throughout the entire CCD District. Curry County (and Coos and Douglas Counties) is currently suffering severe unemployment - the average unemployment rate in the county in 1974 was 9.1% - and this situation is continuing. Contributing significantly to the county's unemployment is the loss of 106 jobs in the lumber and wood products industry from 1973 to 1974. This year, 1975, there are 290 fewer jobs in the lumber and wood products industry than 1974 due mainly to the closure of the Western States Plywood Cooperative mill near Port Orford.

As the Draft Statement pointed out, Curry County's economy is highly dependent upon the timber industry. This industry has been severely affected by national economic trends and adverse local industry conditions. Prominent among these adverse local conditions are accelerating high stumpage prices and declining resource availability.

During the four-year period between FY 1971 and FY 1975 the statistical high bid prices for Douglas-fir from National Forest lands within the Powers Ranger District nearly quadrupled. This rapid rise in price has certainly impaired the ability of the local firms to maintain viable postures within the regional and national lumber and wood products industry. This has contributed to production curtailments, firm closures and job losses within the area's primary basic industry.

The reasons for the price rise are varied, however, it appears that the timber sales policies of the Siskiyou National Forest may have contributed to the phenomenon. Insofar as future land use decisions regarding the Mt. Butler-Dry Creek Unit will highly influence commercial timber availability in the area, these decisions will further influence local timber prices and the competitive status of local forest products firms. It is appropriate that the probable impacts upon timber prices and, hence, the area's economy of possible future land use decisions within the Unit be

assessed by the Forest Service for consideration during the land use decision-making process.

A further factor contributing to the displacement of employment opportunities in the lumber and wood products industry in Curry County is declining availability of merchantable timber. The USFS Pacific Northwest Forest and Range Experiment Station, and others, have repeatedly analyzed historical reductions in log supplies in Western Oregon and predicted continuation of the trend. The following data outline the severity of this problem in the Curry County area by comparing the average timber harvest from the area in 1973 with the five-year average for 1969-73.

CURRY COUNTY TIMBER HARVEST
1973 VS. FIVE-YEAR AVERAGE (1969-73)

HARVEST TYPE	CHMCL. FOREST ACREAGE (000)	HARVEST LEVEL (HBF)		CHANGE (%)
		1969-73	1973	
TOTAL	855 (100%)	298,172(100%)	253,636(100%)	-15%
PRIVATE	310 (36%)	130,129(44%)	86,339(34%)	-34%
NATIONAL FOREST	483 (56%)	135,034(45%)	138,620(55%)	+03%
OTHER PUBLIC	62 (07%)	33,009(11%)	28,677(11%)	-13%

DATA SOURCE: "Oregon Timber Harvest," (1966-73), Pacific Northwest Forest and Range Experiment Station; Forest Resources and Forest Industrial Development in the Oregon Coastal Study Area (1968), Daniel D. Oswald, U.S. Forest Service.

The data show that Curry County is experiencing timber harvest trends parallel to those elsewhere: rapidly declining harvests from private sources which have been only partially offset by supplies from public lands. Obviously, a continuation (or acceleration) of these trends in the future indicates aggravated severe dislocation for the area's timber industry-dependent economy.

The Experiment Station has recently indicated in a publication, Two Projections of Timber Supply in the Pacific Coast States, that the severity of the economic dislocation can be mitigated through the undertaking of "intensive management" practices. This possibility respective to the Planning Unit and the South Coast economy was not discussed in the Draft Statement, even though it was indicated that, under the Proposed Action, lands designated for commercial purposes would be managed with "intensive timber management activities."

It appears appropriate that the Siskiyou National Forest, in its land use planning process for the Planning Unit, address the issue of what impacts intensive timber management practices could have upon the level of timber harvest within the Planning Unit. Answers to the following questions should be integral to a comprehensive evaluation of the proposed activities for the Planning Unit:

1. What specific activities (e.g., precommercial thinning, conversion of hardwood stands to conifers, use of genetically superior seedlings, etc.) are being anticipated by SNF as elements of its "intensive timber management activities"? At what level is it anticipated that these activities will be undertaken?

2. What will be their impact upon fiber and saw-timber production within the Planning Unit?

3. What is the maximum biological potential yield from the acreages designated for commercial timber production within each of the considered alternatives?

4. What will be the probable cost of these activities?

5. Will these activities include reasonably rapid conversion of poorly stocked conifer acreage (5,186 acres) and hardwood-stocked acreage (2,984 acres), which together represent 37% of the Planning Unit, to well-stocked stands of Douglas-fir?

6. If these activities result in greater Douglas-fir fiber and saw-timber production within the Planning Unit, what effects will this increased growth level have upon the "annual cut" (as defined in the Draft Statement)? (This question is based, in part, upon the allowable cut effects discussed in the PMW/FRES publication listed above and the report, PMW-26: Sensitivity of Allowable Cuts to Intensive Management)

7. Upon what basis was the estimated annual cut for the Proposed Action within the Planning Unit determined? Did this determination of an apparent growth cycle of approximately 75 years (non-declining annual yield of 5.4 MMBF from a present resource of 400 MMBF) include the following considerations:

A. The allowable cut effects of the planned intensive timber management activities?

B. Technological advancements which have increased industry's ability and desire to utilize smaller logs?

8. What opportunities exist for SNF, under the Proposed Action, to increase the annual cut within the Planning Unit based upon the considerations outlined above? What will be the likely environmental impacts of the potential increased harvest rate? What will be the comparative anticipated costs of an accelerated harvest program vs. the Proposed Action in the Draft Statement?

9. What specific environmental impacts - especially upon water quality - can be anticipated for the following activities?

A. An accelerated timber harvest schedule due to recognition of increased growth because of intensive management practices.

B. An increased annual allowable harvest due to recognition of technological trends toward utilization of smaller logs.

C. An accelerated schedule during the next 1-3 decades for harvesting merchantable timber within the Planning Unit to compensate for rapidly declining timber availability from private commercial forest land.

Another major economic concern related to the decisions being made for the Planning Unit is relative to the commercial and recreational fisheries industries for the South Coast. The Elk Creek hatchery has contributed significantly to stabilization of the commercial fishing season off the South Coast. It has also been instrumental in diversifying and enlarging the tourism-recreation industry of the area.

The industries contribute to the diversification of the area's economy. Maintenance of these industries and the water quality upon which they are dependent is important to the area's economy and this importance is recognized in the Draft Statement. Public evaluation of the planning accomplishments for the Unit could be enhanced by a more detailed analysis of the sensitivity of the water quality within the Unit to timber harvesting and timber management practices.

More detailed information regarding the issues outlined above is vital to a comprehensive public assessment of the land use alternatives of the Unit. Butler-Dry Creek Unit. To the extent that this information can be secured and made available, it would be in the public's best interest.

Thank you again for this opportunity to respond to the Draft Statement. If we can further clarify any of our stated concerns or otherwise assist in the development of the Final Statement, please feel free to call us at any time.

Very truly yours,

G. Anthony Kohn
Executive Director

GAK/edh

Letter No. 38

1308 S.E. GERMOND
ROSEBURG, OREGON 97470

April 3, 1975

Mr. William P. Ronayne
Forest Supervisor,
Siskiyou National Forest
Grants Pass, Or.

Dear Sir;

Re: USFS Environmental Statement - Land Use
Plan for Mt. Butler-Dry Creek Area.

Page 11 deals with processing capacity vs capacity of the land; this offers the possibility of wilderness, for some time to come, at least. Since the woods are apparently still being measured in board feet instead of fibre production, we have the comparatively new system of bringing in much more fibre to the mill, and using much more of the tree at the mill. Weyerhaeuser figures about 94% of the tree being used, vs down to 50% a few years back, by some mills. Then you have the advantage of genetic stock, to further increase forest capacities.

The above is not to argue wilderness on the basis of capacities, but more on the basis of use. With approximately 90% of the soils in the Unit, unstable in character (p.13) you may well consider selective logging as being the safest method of logging in large part. Processing capacity gives you much more room than normal. Page 15 dwells on this point in excellent fashion.

Also, page 15 is a classic interpretation of water protection, which is all-important. Pages 16, 17 & 18 & 19 pay great and well-deserved attention to fishing. With the ban on fishing on the Columbia, and with the secondary importance of fishing to the economy of Port Orford, this is most commendable. Pages 21 & 23 stress this subject still further, emphasizing the importance of buffer strips.

Page 23 deals with the importance of chip production in reducing fuels. I do not know if portable chippers can be used, but I do know that Weyerhaeuser uses these substantially. Chip trucks often follow the chippers. I am very glad to see your statements on burned vs unburned clearcuts; this burning has been a sore point with me. On page 24 you mention that timber harvest will be deferred, under certain circumstances. Good!

Page 25: I am glad to see that coordination

Mr. W. P. Ronayne

#2

April 3, 1975

between parties will minimize damage from mining. Recreation, pages 25, 26 and 27: Nothing is said about ORV's, which have caused untold damage, some of it relatively permanent, to many a sylvan spot. You will someday be approaching the day when permits will be desirable, for everybody. You acknowledge this to some degree in predicting increased use of this area. For the moment you will probably wish to concentrate your efforts on ORV's, which should be done, thoroughly.

On page 28 you mention net value, which is being very realistic. However, using fibre measurement instead of board feet, this figure could be increased. Waldorf has just announced a machine that 'vacuums' the forest floor after logging; this could play a part in increasing the yield. This also involves material at bottom of page 32.

I have seen the Weyerhaeuser cable assist technique used very successfully.

Pages 33 & 34 deal again with water, very well. I am glad to know of the attention paid.

Page 36: The nesting tree, the 500' buffer strip, and the snags per acre; this is the best protection I have seen in any EIS.

Pages 37, 38 & 39 are simply superb; I endorse them heartily.

Regarding Wilderness: this is a sore point between loggers and environmentalists, with the Forest Service caught in between. In 1974 there were 236 million visits to the National Parks; more than the total population of the United States; an increase of 27% in the last 4 years. There is a message there for all of us.

In closing I wish to thank you for the remarkable document you have produced. It is a pleasure to read, and know that the Mt. Butler-Dry Creek is in such capable hands. I endorse the proposed action.

Sincerely yours,

David Whitaker
Harris Whitaker

Info	✓
Action	✓
Distrib.	✓
Supv.	✓
T. S.	✓
A. S.	✓
Lands	✓
Engr.	✓
Fire	✓
Wildlife	✓
SLICKYCU	✓
APR 7 1975	
B & F	
Permit	
Review	
Ad. Serv.	
Gen'l	
Permit	
Zone I	
Zone II	

W/
pht/cut

Info	✓
Action	✓
Distrib.	✓
Supv.	✓
T. S.	✓
A. S.	✓
Lands	✓
Engr.	✓
Fire	✓
Wildlife	✓
SLICKYCU	✓
APR 7 1975	
B & F	
Permit	
Review	
Ad. Serv.	
Gen'l	
Permit	
Zone I	
Zone II	

Letter No. 39

Mr. W.P. Ronayne, Supervisor
Siskiyou National Forest
P.O. Box 440
Grants Pass, OR 97526

Info	Adm.	Sup.	Land	Eng.	Fire	Wild	Siskiyou	APR 11 1975	B. & P.	Forest	Ad. Serv.	Public	Zone I	Zone II
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April 9, 1975

Dear Mr. Ronayne,

I have read the Draft Environmental Statement on the Mt. Butler Dry Creek planning unit, and I wish to offer the following comments:

The Environmental Statement is a reasonably clear and concise overview of the problems of utilizing the resources of this planning unit. The proposed action, however, appears to be a poor choice in view of the information presented in the EIS. My own observations in the area support the notion that intensive resource extraction is poor policy in this unit. Alternatives 1 and 2 are more acceptable than the proposed action, and I favor the first alternative because it would best protect the unit's wilderness, wildlife and water resources.

The proposed action would continue the Siskiyou's policy of intensive and intensive timber management. The steep unstable soils in the unit are not suited to this kind of use, and the investment required to carry out the action is not worthwhile.

The EIS does not convince me that 5.4 million board feet can be taken from this unit in perpetuity. Using your figure of 400 million board feet of accessible standing timber, gives an average rotation age of about 75 years. Allowing a generous but probably necessary reforestation lag of five to ten years means that trees on the average of 80-80 years old will be cut. Douglas fir this young and not packed its culmination of biologic or economic increment by any standards I know of. The Forest Service's organic legislation specifies that only mature, dead or dying trees be cut. This policy is as sound now as it was in 1897, on both silvicultural and economic grounds.

The proposed action would take a tremendous investment of money and energy, which could be better spent elsewhere. The inefficiency of this investment is expressed in your computed cost-benefit ratio of 1.021. Not all of this investment would come from the timber purchasers, either. The public would pay for the initial access roads, for administrative expenses, and for inadvertent, unexpected resource damage. Intensive timber management is better suited to other areas on the Siskiyou already accessed by logging roads.

You use a curious logic to justify appropriating money to build the initial logging roads in the unit. Timber receipts would pay for the roads in the long run, assuming that cutting went ahead planned. What if the resource damage proved to be greater than anticipated? The already-built road system would be a strong incentive to continue cutting and recover the return on the investment.

Your soils inventory shows that 90% of the unit has critically unstable soils. The terrific landslides in section 36 show the results of careless entry on these soils. Throughout the EIS are warnings on the difficulty of logging this country. Given the nature of fragile rock-mulch soils, a conservative approach is best. Then is the proposed action so grossly timber oriented? I have seen any examples on the Siskiyou of the kind of careful forestry you claim would be practiced on this unit. You propose, in effect, to undertake a gigantic uncontrolled experiment.

Info	Action	V
Johnston		
Barrett		
Rest		
Test		
Learn		
Write		
Review		
Sign		
Reserve		
TIMBER-11		

The EIS states that logging individual Class III and IV stream drainages would not increase downstream water temperatures. Does this same assertion hold if many such streams are cut over? The critical situation with the Elk River Hatchery's water supply dictates a conservative approach that should be applied to the Dry Creek drainage as well.

I do not favor developing a trail along Dry Creek. Why is it necessary that this drainage be used by as many people, for as many purposes as possible? The Grassy Knob roadless area offers delightful hiking for the person who likes a stiff challenge. A walk up Dry Creek on an improved trail would miss the whole adventure of exploring this trailless canyon.

The EIS gives only a sketchy description of Grassy Knob's wilderness values. Its primary value is not for recreation or scenery, although it offers both. Grassy Knob is most valuable as an example of what happens to land, trees, water and wildlife when man does not meddle in their affairs. We do not have enough of these undisturbed areas left. No more should be turned to commercial use in our generation. It is anthropocentric arrogance to think that every acre of the earth should do our bidding, if not with board feet of timber, then with visitor days of recreation. Wilderness cannot be justified on economic grounds, and the economic efficiency criteria used throughout the Siskiyou's planning process guarantee that wilderness will be given short shrift.

Nothing in the 1964 Act requires that a wilderness area have unique geologic or biotic features. The wilderness Act requires only that an undeveloped area of minimum size have "outstanding opportunities for solitude or a primitive and unconfined type of recreation." Grassy Knob and the Red Cedar-sunshine additions meet these criteria. The entire roadless area should be set aside for study and eventual recommendation to Congress. The commercial forest within the roadless area should be subtracted from the allowable cut.

National Forests do not exist to serve a local economy; they must serve a national interest. It is evident that the Siskiyou intends to dedicate the Mt. Butler-Dry Creek unit to the service of Curry County, establishing a Grassy Knob wilderness study area is the only way I see to insure a proper national perspective in the planning of this area.

Sincerely,

Fred N. Swanson

Fred N. Swanson
816 Walnut
Missoula, Montana 59801

Letter No. 40

April 15, 1975

Forest Service
Siskiyou National Forest
Grants Pass, Or. 97526
Forest Supervisor

Dear Mr. W.P. Ronayne:

Under the provisions of Public Law 91-190, I would like to comment on the land use plan you have proposed for the Mt. Butler-Dry Creek Planning Unit in Curry County, Siskiyou National Forest.

Please put me on the record as strongly backing what our own State of Oregon's Fish Commission feels is the correct way to proceed... adopt Alternative #2, with modification.

Let me quote to you out of your own impact statement:

"Any increase in water temperature in Elk River from streams originating in the Planning Unit or elsewhere, could put the hatchery out of operation."

With this possibly disastrous outcome in mind, please reconsider your choice of #3, and adopt what the Fish Commission has in mind. In doing so please note that as the timber industry continues consolidating its wood processing operations into the larger, more efficient mills located in Coos Bay and other areas well away from our truly local economy, the importance of the Elk River Fish Hatchery will continue to increase. Take notice of the fact that all during this Housing-Wood Products Depression we are in, the Hatchery has kept right on producing jobs and even more importantly FOOD for our people...sure can't say that about the trees in the Mt. Butler-Dry Creek Area!

Sincerely yours

Alan Mitchell

member

Curry County Planning Commission
City of Port Orford Planning Commission

cc
Senator Mark Hatfield
Senator Bob Packwood
Governor Bob Straub
Oregon Fish Commission

Letter No. 41

Rt. 1 Box 527
Gold Beach, OR. 97444

April 19, 1975

Mr. W. P. Ronayne
Siskiyou National Forest
P. O. Box 440
Grants Pass, Oregon 97526

Dear Bill:

I've been meaning to write to you concerning the Mt. Butler-Dry Creek Unit for quite some time now, but haven't had the time or inclination to do so. However, having read the Draft Environmental Impact Statement, I realize that I've got to do something.

Frankly, Bill I'm extremely disappointed that you have chosen to log this area. After reading the EIS, it is apparent that local economic interests have a much greater effect on the Forest Service than I had ever believed. I've always respected you, probably more than any other Forest Service official I've known, and I find it difficult, if not impossible, to believe that you would be influenced by these interests to such a degree.

It will be redundant to tell you why I feel this area should not be logged, as your EIS states these reasons quite well, but I would sum them up as follows:

- 1- The potential for damage to all resources (including the future timber resource) must be considered very high.
- 2- It is quite likely that reforestation will prove virtually impossible in much of the Unit.
- 3- Massive land movement, due to excavating highly unstable soils, is quite likely.

Info	✓	Adm. Serv.	✓	Zone I	✓	Zone II	✓	Zone III	✓	Zone IV	✓	Zone V	✓	Zone VI	✓	Zone VII	✓	Zone VIII	✓	Zone IX	✓	Zone X	✓	Zone XI	✓	Zone XII	✓	Zone XIII	✓	Zone XIV	✓	Zone XV	✓	Zone XVI	✓	Zone XVII	✓	Zone XVIII	✓	Zone XIX	✓	Zone XX	✓	Zone XXI	✓	Zone XXII	✓	Zone XXIII	✓	Zone XXIV	✓	Zone XXV	✓	Zone XXVI	✓	Zone XXVII	✓	Zone XXVIII	✓	Zone XXIX	✓	Zone XXX	✓	Zone XXXI	✓	Zone XXXII	✓	Zone XXXIII	✓	Zone XXXIV	✓	Zone XXXV	✓	Zone XXXVI	✓	Zone XXXVII	✓	Zone XXXVIII	✓	Zone XXXIX	✓	Zone XL	✓	Zone XLI	✓	Zone XLII	✓	Zone XLIII	✓	Zone XLIV	✓	Zone XLV	✓	Zone XLVI	✓	Zone XLVII	✓	Zone XLVIII	✓	Zone XLIX	✓	Zone L	✓	Zone LI	✓	Zone LII	✓	Zone LIII	✓	Zone LIV	✓	Zone LV	✓	Zone LVI	✓	Zone LVII	✓	Zone LVIII	✓	Zone LIX	✓	Zone LX	✓	Zone LXI	✓	Zone LXII	✓	Zone LXIII	✓	Zone LXIV	✓	Zone LXV	✓	Zone LXVI	✓	Zone LXVII	✓	Zone LXVIII	✓	Zone LXIX	✓	Zone LXX	✓	Zone LXXI	✓	Zone LXXII	✓	Zone LXXIII	✓	Zone LXXIV	✓	Zone LXXV	✓	Zone LXXVI	✓	Zone LXXVII	✓	Zone LXXVIII	✓	Zone LXXIX	✓	Zone LXXX	✓	Zone LXXXI	✓	Zone LXXXII	✓	Zone LXXXIII	✓	Zone 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Mt. Butler-Dry Creek

4-The likelihood that the buffer strips along the Class I and II streams will be partially blown down is very high. This could result in the virtual destruction of the Elk and Sixes River salmon runs if water temperatures are increased, if siltation becomes too severe, if the stream channels become plugged, or if a timber dam builds and breaks as happened in Butler Creek years ago.

5- The cost of logging and road building in the Unit will be so high, that there will be very little profit left in the logs. Indeed, the EIS states that initial road construction costs will exceed the value of the timber removed, and not until sometime in the future will ensuing timber harvests return the taxpayer's investment. What if access money is unavailable? Will you then remove larger acreages of timber initially to pay for the roads?

6- Logging will destroy the remaining habitat of several rare and endangered species. Should man claim such a right? The hunter who shot the last passenger pigeon may be forgiven, because he didn't know what he was doing. But, you are not blessed with such ignorance.

7- This is an ideal situation to prove to the public that the Forest Service actually does give equal weight to the other Multiple Uses - in this case by leaving them alone. To do otherwise will prove quite the opposite.

I think you and I as foresters have a duty to ourselves and our profession that supersedes any economic or political loyalties, and when we see something wrong being done to the forest, then we'd better

Mt. Butler-Dry Creek

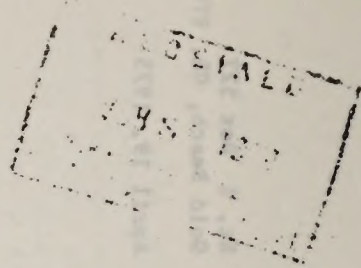
try to correct the situation or consider ourselves unworthy of being called professional foresters.

I urge you most strongly to reconsider your position Bill, and change your recommendation to Alternative 1. Let's leave this one small area unmanaged.

Sincerely,

Jim Rogers

Jim Rogers



Rt. 1 Box 527
Gold Beach, Oregon 97444

Mr. William P. Ronayne, Supervisor
Siskiyou National Forest
P.O. Box 440
Grants Pass, Oregon 97526

Re: Mt. Butler - DryCreek
Draft Environmental
Impact Statement

Dear Bill:

I feel there are certain questions that must be thoroughly evaluated before writing a final EIS choosing Alternative #3 as the most responsible course of action:

1. What would be the potential damage to the fisheries resource if the buffer strip (either a small or a major portion) blew down in a) Dry Creek b) Anvil Creek & c) Redcedar Creek?
2. Based on past successes and failures in maintaining buffer strips, what is the likelihood of these buffer strips remaining relatively intact?
3. Is there a likelihood of severe cutbank ravelling, and if so, has any method yet been devised to prevent, or at least significantly minimize this problem? Grass seeding seems to be of little benefit on steep cutbanks. How many cutbank failures per mile can be expected in the area according to the Cutbank Stability Reconnaissance Survey?
4. How much turbidity might be expected in the primary spawning streams as a result of this ravelling and what result might the potential amount

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JUN 27 1975	
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Review	
Final	

-2-

of turbidity have on salmon spawning?

5- Is the question of the possibility of massive soil movement in logged off valid concern in your estimation?

6- What is the actual estimated cost of the road system (based on current figures)?

7- Are there excess debris disposal areas within feasible hauling distances?

8- Will the 30 mile road plus 4 mile ATV trail be sufficient to log the entire area?

9- Are adequate talloids available to skyline log the land currently being considered for that system? What is the current cost for skyline logging in this terrain?

10- Have helicopters actually proven economically capable of lifting fir out of a deep canyon and up to a ridgetop road? What is the estimated cost for this type of operation?

11- Is it feasible to construct the large landings needed for helicopter logging in this area?

12- Are you aware of any other methods which might be available in the foreseeable future to log the area without the problems entailed in skyline and helicopter logging?

13- Do you expect regeneration to be satisfactory to the extent that a perpetual annual harvest of 5.5 million board feet will be sustainable over an infinite period of time?

14- Is there a likelihood that the Spotted Owl population will be eradicated on the Forest or do you feel there will always be sufficient

P.O. Box 55
Coos Bay, OR 97420
April 24, 1975

W.P. Ronayne
Forest Supervisor
Siskiyou National Forest
P.O. Box 440
Grants Pass, OR 97526

Dear Mr. Ronayne:

I want to add my views and comments on the MT. BUTLER-DRY CREEK DRAFT ENVIRONMENTAL STATEMENT and planning uses.

This statement comes from an individual and concerned citizen. It is based on a reading of the DRAFT STATEMENT and recent travel mostly hiking into the 22,100 acres of the planning unit.

It is my opinion that alternative No. 1 should be adopted. The following reasons support this view:

1. The potential for designation of the main part of the area as wilderness should be retained. Extensive logging, road building will initiate an irreversible process. Due to changing social values and criteria for wilderness areas we may find that in 25 to 30 years these 22,000 acres may well qualify for wilderness designation.
2. The fishery industry and sports fishing should be preserved at its maximum level. Even though the "proposed land use plan" projects little loss of fishery potential these are qualified in the draft with the word "minimize" which does not carry the assurance of being able to promise undeniably that the fishing interests could and would be maintained at maximum level.
3. The high water runoff - "approximates 65 inches" p. 33 - has no place to except into Elk and Sixes river via the small creeks. Even though the proposed plan provides for greenways along Dry Creek and Fishes Wildlife area north of Elk River THERE WILL BE INCREASED RUN OFF FROM THE TIMBER MANAGEMENT AREA surrounding Dry Creek. Expert testimony in the draft noted that the economic value of fish in Sixes River is down due to extensive logging on the eastern watersheds of that river.
4. The recreational value of the area should be preserved. Cut over land is of little scenic value.
5. There is a continuing ground swell of public concern and interest in camping, hiking, backpacking, wilderness, nature-recreation. If this trend continues National Forest area is needed to meet the demands of this public interest. If this interest in these activities is reversed timbermanagement uses of the area can always be placed foremost later.
6. Last, I would urge that individual opinion, not just mine, but all public opinion be given proper weight in the final decision. It is the nature of the democratic way of life that the overall determination of goals and purposes shall rest with the citizens not with experts or with government or bureaucracies.

Sincerely - M. J. Jones

-3-

15- What areas, specifically are being considered for exchange in and adjacent to the Unit, and what are the dollar values being assigned to these lands?

16- Is YUM yarding proposed, and has it proven to be silviculturally beneficial or detrimental?

17- The estimate of precipitation in the Unit seems far too low. If there is actually 50% more precipitation than originally estimated, would this make any difference in your management activities?

18- Do you anticipate minimum and maximum water levels in the Elk to become more extreme when additional timber is removed from its watershed?

19- How were timber volume estimates made, and if future estimates indicate more or less timber in the area, will the allowable cut in the Unit be correspondingly increased or decreased?

I hope you'll give sufficient consideration to these questions.

I have, and I don't feel the answers to many of them would lead me to conclude that the choice of logging the area is in the best interests of the people.

Very truly yours,

Jim Rogers
Jim Rogers

Port Orford, Ore
May 9, 1975
11:00 A.M.

Letter No. 46

2

Mr Ronagne

I am sending this letter to explain some facts stated in the formal letter to you. First of all let

me compliment the Forest Service Work up Elk River. (Siskiyou National Forest)

The Elk certainly runs cleaner than the Sixes, and the watershed of the Elk holds water much

more efficiently than Sixes. This

shows that timber management practice

by the Forest Service must be

more efficient than private timber

owners ~~where~~ protection of a water

shed is concerned. I have spent

my entire life here, my Father was a

dairyman and myself now dairying on

Elk River.

was

I know that the timber industry exceeds Agriculture many hundred times possibly over, income wise, and creating jobs ect. (Basic Industry page 10 Impact Statement Mt Butler - dry creek)

I only hope ~~that~~ that you and the rest of Forest Service Personnel can ^{continue to} decide how to manage the Entire Elk River Watershed with a minimum of damage to the entire Elk River Resource. (Timber lands, Fisheries, Agriculture)

Careful management of the timber harvest of Elk River watershed will benefit everyone, now and future generations. As you know soils cannot be replaced from erosion, and silt ~~benefits~~ in the stream benefits ~~no~~ no one.

A logger friend of ours said "Nature heals the land," but mans poor management practices can certainly cause ~~the~~ nature to heal the land awfully slow.

Letter No. 47

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P.O. Box 166
 Port Oxford, Oregon 97165
 May 4, 1975

Supervisor
Siskiyou National Forest
P.O. Box 440
Grants Pass, Oregon 97526

Deax Six:

I have read the DRAFT Environmental Statement for the Mt. Butler - Dry Creek Planning Unit located near Port Oxford. I am against the current proposal as it now stands. In essence the major question to be answered is, "Can this Unit be harvested correctly so that there are minimum impacts to water quality?" The draft statement does not convince me at all. In fact the major weakness of the statement is that there is not enough established criterion to stop the harvest of timber if water quality is seriously threatened.

Below is a list of points concerning both the above ones and other aspects to which I would like to address myself.

1. On page 37 under Management Objective's it states, "Management activities must protect and where practical improve water quality." However, on pages 33, 34, 42, 74 and elsewhere shows this simply is not the case. ("The Proposed Action will cause some adverse impact to the Fisheries resource." p. 44)
2. On page 23 the statement says, "Any increase in water temperature in Elk River, ... could put the hatchery out of operation." The net value of timber and jobs is \$750,000 per year. (p. 74) Yet the Forest Service is willing to gamble that a \$1,537,000 Fisheries Resource will not be destroyed. "... could have a large negative impact on Fisheries Resources within the unit." (p. 19)

3. In the Port Oxford area there are no mills in operation at this time. The economic impact of the Planning Unit may very well have little effect, except to the commercial and sports fisheries - and that will be a negative effect. Since the mill capacity in Curry County is double the potential annual harvest, we can hardly expect much improvement in this area. Economically, Port Oxford can not stand a reduction in other economic areas. I.e. the fisheries resource. We need economic diversification (see p. 11)

4. Perhaps the most obvious weakness in the statement is a failure to convince me that the roads to be built in the area will not cause severe problems. The average slope of the Planning Unit is 80% (p. 4, p. 12) yet on page 108 (Road Construction) it states that 60% slopes have a 70% chance of being unsatisfactory. On critical soils road building had a 90% unsatisfactory rate. In the Planning Unit the area is composed of 90% critical soils. (p. 13)

It is stated on p. 21 that "... more sophisticated road construction and timber harvest techniques have been used elsewhere on the Siskiyou National Forest." (p. 21) If that is really the case, why doesn't the engineers report reflect that? What are these so-called sophisticated techniques? Do they really work? Or, does the Forest Service have to experiment on the McButter - Day Creek area to find out? Will the F.S. quit road building if it isn't successful? 4. "The road mulch ... may cause regeneration problems." (p. 32) If that is the case, then the area should be 100% replanted!

5. Why is it that wherever a problem is discussed in the statement it says, "may cause damage or may do this or that, yet when the Forest Service proposes an action to correct a problem the statement always says will? Example: "Although Soil Management Policy's timber harvesting techniques, and road construction will minimize accelerating soil erosion..." (p. 48) What do you mean will? You mean MIGHT!

6. Appendix F. Analysis of the opinion and reasons given by respondents to the brochure detailing the options depends entirely upon who received those brochures. A survey of this kind in no way could be considered the views of the general public. Apathy by the public does not necessarily mean they are in agreement with those who formulate planning units.

The single most important statements are found in Table X, p. 130. Notice the proposed action is the only alternative which the timber interests favored! And of course that alternative became the proposed action. My, my, one wonders how cozy the relationship between those interests and the Forest Service really is.

Notice also, that the Fisheries people were 100% against the proposed action.

If the proposed action is accepted as the final choice of the Forest Service, I would like to see the following modifications:

- (1) Constant monitoring of water temperature of the Elk River at the hatchery. Any dangerous increase of such temperature will automatically stop all timber harvesting in the area in question. The same would apply to dissolved oxygen in the water; turbidity of the water; and pH and other factors which may cause harmful effects to the fisheries resource.
- (2) Road construction would cease if they were unsatisfactory as detailed in engineers report on critical soils and topography.
- (3) Erosion problems would be immediately rectified by whatever measures are necessary and if necessary all logging would stop.
- (4) Greater strips of trees should be left along the banks of Day Creek and water temperature should be closely monitored.
- (5) Necessary funds for erosion control, replanting, and monitoring should be planned for and be made available before the area is logged.
- (6) Appendices A and B should be made separate (pp 82-86A, pp 87-92)

P. 4

- (7) Since the value of the yearly timber and fisheries resources are nearly equal in the proposed unit, the Oregon agencies involved in fisheries should have a say in how the area is managed.
- (8) Once an area has been harvested roads should be seeded and closed to the general public.
- (9) Public input should have a real effect on how the proposed unit should be managed.

IN ESSENCE what I am saying is that I do not mind seeing the area logged IF very strict safeguards are employed. And if trouble starts, the loggers will cease before the damaging effects ^{which} water quality to a dangerous degree. The Proposed Action is ~~not~~ strict enough, nor is it convincing in its present form that it will protect water quality.

Sincerely,
William O'Sullivan
William S. O'Sullivan

Letter No. 48

May 5, 1975
Forest Supervisor
Siskiyou National Forest
P.O. Box 440
Grants Pass, Oregon 97526

Dear Sir: Re: The Mt. Butte-Dry Creek Plan (Also Known as the Grassy Knob Roadless Area)

This highly interesting area is the subject of a Draft Environmental Impact Statement recently issued by the Siskiyou National Forest. It has been called to my attention that the Forest Service has chosen to log large portions of this fragile area. Why?

Last year there was substantial public response favoring the wilderness and backcountry alternatives for most of this scenic area. And with particular reference to the mistake of disturbing the fragile soils and priceless fisheries and biologic resources. Think goodness the public is becoming more aware of these alternatives and imbued with their rightful responsibility in these matters. Therefore, hopefully we will with wise, and unselfish, planning be able to save our insecure and exploited environment from the hands of "Fast-buck" artists.

There has been too much abuse of power lately and people are fortunately realizing they are the ones to correct this--witness how Congress is responding to the pressures of the public (Vietnam cut-back of funds and military power).

Yours sincerely,
William B. Hewley
Mr. & Mrs. W.B. Hewley
604 Dryer Valley Rd.
Selma, Oregon 97538

Info	✓
Action	✓
Distrib.	✓
Serv.	✓
T. M.	✓
A. B.	✓
Lands	✓
Engr.	✓
Fire	✓
Wildlife	✓
SISKIYOU	✓
MAY 6 1975	
B & F	
Person	
Justice	
Ad. Serv.	
Cont. G.	
Part. G.	
Zone I	
Zone II	

W. P. Ronayne	Forest Supervisor	Siskiyou National Forest	P. O. Box 440	Grants Pass, Oregon	07526
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Letter No. 49

4000 4th Avenue, North
Great Falls, Montana 59401

May 5, 1975

Dear Mr. Ronayne:

This letter is in reply to the draft environmental statement for the Mt. Butler-Creek planning unit. Though there are many things that this purported environmental study is not, I must admit that it is consistent with your previously demonstrated insensitivity toward the protection of the forest environment as established by the recently completed plan for the Grants Pass unit. Since in that statement you consistently refused to address yourselves to my questions, choosing rather to discuss points only vaguely related to the question, I will not waste my time repeating all of the same concerns. The quality of the draft statement has not improved and I am confident that your answers won't either. You appear determined to justify exploitation of the Siskiyou at any price and you have made it abundantly clear that public opinion is merely a legal formality with which you must comply.

Dealing specifically with the Mt. Butler-Creek planning unit, the following points clearly indicate your insensitivity toward the resource you are charged with protecting and just as clearly demonstrate your haste to 'get to the trees'.

- 1) Roadless area B11 was originally incorrectly inventoried. A later addition was listed as a separate roadless area even though contiguous to the original area. Additionally, un-inventoried roadless acreage appears to lie to the east of B11. Since B11, B12 and any un-inventoried roadless resource have never been accorded a study as the singular unit they are, all past studies of this resource are invalid.
- 2) A GI-rating of 57 for the roadless area(B11) even if accurate would be virtually meaningless because it did not include the area not originally inventoried, a purposeful error.
- 3) Road construction into this area is stated to create 'unacceptable erosion and siltation' yet active planning to that end continues.
- 4) Active road construction plans predate this land use planning process and undoubtedly had a strong influence on this planning.
- 5) 90% of the unit is admitted to have 'critical soils' a category that in most cases precludes timber harvest and/or road building. In this case, however, in spite of critical soils limitations 60% of the unit will be available to logging. Soil problems are humanely cared for by prodigious lip service all of which will be about as effective as a dam made of window screen.

page 2

6) The proposed management further endangers already threatened species with the likely prospect of accelerated extinction. Unless an animal is classed as a game species or is at home in areas newly rained by loggers it is misclassified as worthy of special consideration.

7) The assumptions and objectives listed on pages 37 and 38 clearly indicate that all resources will be considered only in the context of their compatibility with the predetermined timber harvest policies. This is a blatant violation of FWSA which states that no resource has a value any greater than any other resource.

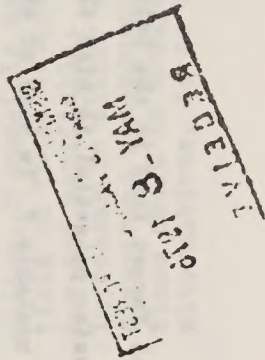
8) It is clear throughout the statement that the only environment really receiving consideration is the economic environment. To hell with the future, let's cut them trees!

In conclusion, I wish that I could say that I hated this letter would awaken the responsibility to properly manage the Siskiyou for all resources, but based on past communications it appears that that is all it will be -- a wish. Rather this letter is merely a demonstration of my frustration at witnessing such a callous demonstration of managerial abuse and not being close enough to the scene to effectively pursue an administrative appeal. My second wish is that someone else will become incensed enough about the Siskiyou mismanagement to do effectively what I cannot.

Sincerely,

Thomas E. Horobik

Thomas E. Horobik



Info	✓
Action	✓
Disturb	✓
Stake	✓
Y.	✓
A.C.	✓
Leach	✓
Eng.	✓
Fluc	✓
Wetland	✓
SISKIYOU	✓
MAY 12 1975	
B & F	✓
Person	✓
Reserve	✓
Ad. Serv.	✓
Contig.	✓
Purch	✓
Zone I	✓
Zone II	✓
Forest	✓
Forest	✓

Letter No. 50

May 7, 1975

P.O. Box B

Port Orford, Or.

97465

Info	✓
Action	✓
Disturb	✓
Johannsen	✓
Barnhart	✓
Best	✓
McClintock	✓
St. John	✓
Leonard	✓
Stanger	✓
Gross	✓
Resource	✓
SISKIYOU TM	

Siskiyou National Forest

Grants Pass, Or. 97465

Dear Sirs:

Having read the Forest Service draft environmental study for the Mt. Butler-Dry Creek Planning Unit, I can only conclude that the area must be treated with the utmost care if its value is to be sustained. I am particularly concerned with the maintenance of the fisheries industry. As you pointed out in the study, Southwestern Oregon must have "greater economic diversification." if it is to sustain even its present level of economic activity. Presently, the forest products industry is in decline. In such a precarious economic state nothing should be done that could jeopardize the fishing industry or the recreational industry which is partially dependent on sports fishermen and vacationers who are attracted by clear, deep running rivers such as the Sixes and Elk. However, as you say on page 21 of the study: "Any management practices which increase sediment yield in streams of the Planning Unit and ultimately in the mainstem of ELR and Sixes River downstream, will have a negative impact on the value of these aquatic resources. Chronic sedimentation and turbidity destroy spawning areas by occluding and compacting gravels, and reduce populations of fish food organisms and subsequently the fish populations themselves." On p. 23 you say, "Any increase in water temperature in Elk River could put the hatchery out of business." There is obviously not much of a safety margin especially as you point out on p. 13; "Some 90 per cent of the soils on

National Forest land in the Unit are classified as 'critical soils.' This means that the erosion potential is high to severe and/or the stability class is unstable to highly unstable." In view of these facts I don't think that the extensive logging in your statement of proposed action can be justified.

Furthermore, your study indicates that due to many natural conditions the Unit is not suitable for the extensive logging you propose even if danger to the fishing industry were non-existent. For example, on p. 31 you say: "...one of the findings that deserves further study is the relatively low basal area and GBA common to the Unit—even on many of the better sites." If there is a possible low inherent ability of the land to grow timber and a known potential for severe erosion, the Unit wouldn't seem to be a likely candidate for extensive logging. In addition to these problems on p. 32 you say "The rock mulch, when combined with the steep rocky terrain and summer drought and other factors, may cause regeneration problems. These problems will be particularly present where fragile surface layer is disturbed to any significant extent...."

The facts of the study speak for themselves and lead one inexorably to the conclusion that the Unit would be a high risk area for the proposed extensive logging. I don't believe that we can afford to take that risk. Therefore, I am supporting Alternative 2 which is the Alternative recommended by the Oregon Fish Commission. I believe it is the development plan which would best serve the interests of the public.

Yours truly,

Gloria J. Dillingham

Gloria J. Dillingham

copies to: Governor Straub,
Senators, Hatfield and Patkwood
Representative James Weaver
Environmental Protection Agency
Oregon Environmental Council
Oregon Fish Commission

Box 3A Cape Blanco Road
Sixes, Oregon 97476
May 10, 1975

W. P. Ronayne, Forest Supervisor
Siskiyou National Forest
P. O. Box 440
Grants Pass, Oregon 97526

Dear Mr. Ronayne:

As a professional forester, I have become increasingly concerned over the past decade with the attitude of the United States Forest Service toward the various non-timber values inherent in the public's interest in the national forests. My concerns are essentially in sympathy with those of the committee which prepared Senate document #31-115, A University View of the Forest Service, Dec. 1970, when they conclude on p. 13 that "Multiple use management, in fact, does not exist as the governing principle on the Bitterroot National Forest." This is followed by their further finding that "Consideration of recreation, watershed, wildlife, and grazing appear as afterthoughts." This deficiency in the approach to the management of public resources, while directed in the above document to a specific national forest in Montana, can be seen to be operating also in the planning processes of the Siskiyou National Forest -- specifically, in the draft environmental impact statement for the Mt. Butler-Dry Creek Planning Unit of the forest.

In short, the problem is a bias in favor of timber production, with the consequent relegation of nontimber resources to an inferior status in the initial planning processes. This bias is evident throughout the draft EIS in a rather subtle way. While a great deal of space is devoted to nontimber resources, particularly in the inventory sections of the report, the analytical processes used to justify the proposed action contain an inherent bias toward timber production. While a cursory glance at the document might suggest a fair treatment of all resources and values involved, under close scrutiny a rather disturbing pattern of reasoning becomes apparent, a pattern which may be abstracted into the following formula:

1. presentation of quantified inventory data with respect to each of the resources involved in the planning unit.
2. discussion of difficulties and risks involved in implementing the proposed action, also using some quantified or at least verifiable data, frequently in reference to some past action.
3. proposal of solutions to recognized problems, usually without quantified, verifiable data, often without sufficient detail to allow intelligent evaluation on the part of the reviewer.

It is, of course, not the general process of reasoning itself (inventory, analysis of problems, proposal of solutions) which I find objectionable; it is, rather, the fundamental difference in the nature of the data used in each step of the analytical process. Whereas specific, quantifiable data are in copious evidence in steps 1 and 2, allowing for ready verification or refutation of general statements made in these sections, conversely, the conspicuous absence of such specifics in step 3 prevents the intelligent evaluation of proposed solutions to the problems identified in steps 1 and 2. This deficiency becomes increasingly serious as we begin to realize that the welfare of all the resources of the unit depends solely on the validity of these proposed solutions.

In order to see this formula at work, I shall now turn to the fisheries section of the document. Step #1 of the formula, the detailed inventory, is presented on pp. 15-19, in both biological-ecological and economic terms. Two basic conclusions are inevitably drawn from the data: (a) that the Elk and Sixes River drainages support a considerable breeding population of anadromous salmonids, and (b) that this resource is of considerable economic importance to both sport and commercial fisheries. The data is presented in specifically quantified terms so that anyone with expertise in the subject may evaluate the reasonableness of these conclusions, or even check up on the data itself.

Most of step #2 of the formula, the identification of problems, is presented on pp. 19-23, beginning with the recognition that "Land management activities within the Mt. Butler-Dry Creek Planning Unit could have a large negative impact on fishery resources within the Unit, but could also have a direct negative impact on fishery resources (including Elk River Hatchery) downstream to the Pacific Ocean." This assertion is supported by two types of data: (a) the identification of environmental conditions necessary to the successful propagation and continued survival of the species in question, and (b) the relating of these critical factors to the impacts of management practices. The life history information used for the first part could be readily evaluated by anyone knowledgeable in the subject. The evidence regarding past management activities and their effects on the fisheries resource, while not quite so simply evaluated, may nevertheless be checked with some degree of assurance using both Forest Service records, fisheries records, and on-the-ground observation. The various conclusions arrived at on pp. 21-23 concerning certain environmental factors critical to the continued success of the fisheries resource, along with the recognition of possible serious impacts of certain management practices on these critical factors, are on the whole both convincing and verifiable. The recommendation, for instance, that slight increases in either sedimentation or water temperature could have disastrous consequences, and further that either of these conditions could be brought about by the wrong choice of management alternatives, is so thoroughly substantiated as to be readily

accepted by any impartial reviewer, even to the conclusion that "any increase in water temperature in Elk River, from streams originating in the Planning Unit or elsewhere, could put the hatchery out of business." (p. 23).

It is when we arrive at step #3, the solutions proposed for these problems, that we find a rather abrupt change in the nature of the data upon which conclusions are based. On p. 21, after having identified water quality deterioration associated with specific past logging practices in two areas of the unit (in section 36 and along Butler Creek), thus providing concrete substantiation for step #2 of the formula, the paragraph concludes:

However, recently more sophisticated road construction and timber harvest techniques have been used elsewhere on the Siskiyou National Forest. These applications have demonstrated that road construction and timber harvest activities need not result in serious problems of this nature.

I feel it necessary to point out here that I am not attempting to imply that "more sophisticated techniques" do not exist. Quite the contrary, having been involved to some extent with logging in the Butler Mt. area and elsewhere on the Siskiyou National Forest for the past few years, I have seen new techniques, "more sophisticated techniques" if you will, being increasingly required on forest service timber sales. For instance, while a ridge top road was being constructed into the Butler Basin timber sale (This is the same type of road being suggested for the entire unit, indeed this very road is part of that system.), tractors moving rock were buried on two separate occasions by the collapse of the cut bank. Four or five years ago both a tractor and a shovel were deposited in the bottom of the canyon on the Dixie Creek Sale, just East of the planning unit and in the same sort of ground. The shovel operator was killed in this incident, the tractor operator narrowly escaping. If the full bench, ridge top road is one of the new "sophisticated techniques," I am somewhat skeptical of the assertion that these new techniques can give us, with a reasonably high degree of assurance, the confidence that "road construction...activities need not result in serious problems of this nature."

Elsewhere in the report (p. 40), one of the new methods suggested is cable assisted uphill felling, one of the objectives of which is to "protect streams and draws." It is important to note that this method, having been rather extensively used for another purpose by a private timber company in the Cascades, is totally untried in the Siskiyou at all, let alone in such a difficult area as the planning unit. There is no questioning the fact that the method saves board feet of timber which would otherwise be broken up. But it is not uncommon for a felled tree to shoot butt first down hill, to be stopped only by applying tension to the

attached cable, thus forcing the butt into the ground, stopping the tree by digging a ditch with the butt. This problem may not create serious environmental consequences, but the simple fact that it is totally untried in this area gives me little assurance that "timber harvest activities need not result in serious problems of this nature."

The most important thing is that without specific details about these new "sophisticated techniques," the reviewer of the report has no data with which to either assuage or substantiate his understandable skepticism. Here, in that part of the analytical process which consists of attempting to predict the consequences of future actions, by its very nature the most tenuous part of any planning process, we find the weakest type of substantiation, i.e. no substantiation at all.

In addition to this serious failure to provide the wherewithal for intelligent evaluation of the solutions part of the planning process, the EIS contains questionable qualifications in its commitment to the protection of water quality. If we turn to Appendix C (p. 94), for more definite information concerning guidelines for the protection of water quality, we find the definitive statements concerning both turbidity and temperature, those aspects of water quality which seem to be most crucial to the welfare of the fisheries resource, to be compromised by almost identical qualifying phrases -- "except for certain short-term activities which may be authorized...and which are necessary to accomplish legitimate uses or activities where temperatures/turbidities in excess of this standard are unavoidable." (ellipses theirs). What uses are "legitimate" for such exceptions? If indeed turbidity and temperature are of such critical importance to the welfare of the fisheries resource, is such a concession to other uses tolerable in the only definite guidelines we find concerning water quality? Here we seem to have a commitment which is no commitment at all!

All of the above is only one example of the primary weakness of the draft environmental impact statement. But it is illustrative of a formula which permeates the entire document -- a formula which by its heavy reliance on unquantified, unverifiable data suggests a strong bias in its basic approach. I seriously question the validity of an EIS which demands of the reviewer that he place faith in such imprecise data as we found in the solutions section of the planning process. I also question the intent of any managing agency which includes such loopholes in the most definitive commitments to the protection of nontimber resources.

In response to the wealth of verifiable information contained in the inventory and problem identification parts of the report, taking into account the several values, tangible and intangible, represented in the present roadless area, and the overwhelming public sentiment that the area be withdrawn consumption-use management planning and retained in its present pristine state, along with the repeated acknowledgement in virtually every section

of the report of the exceedingly fragile character of every facet of the area, both geological and biological, I find alternative #1, the designation of this area as a wilderness study area, to be the only reasonable proposal for the planning unit. In this way the roadless area is not committed irrevocably to any management direction. Indeed, this is the only alternative presented which avoids such irrevocable commitment until such a time as the representatives of the entire public, i.e. the U. S. Congress, may decide on the basis of a broader value system the management direction which best serves the people and the land. And I find the prospect of a 10-20 year postponement of such long-term commitment to be a perfectly acceptable timetable for decision-making in a situation of such high risks and so many and diverse values.

Sincerely,

George R. Shook
George R. Shook

cc: Theodore A. Schlapfer
Senator Bob Packwood
Senator Mark Hatfield
Representative Jim Weaver
Governor Bob Straub
Oregon Environmental Council
Oregon Wilderness Coalition
Fred J. Swanson
Tom Wiedeman
Curry County Reporter
Port Orford News
Coos Bay World

To Land Use Planning Team

May 10, 75

The policy of the National Forest Service is to protect the forest, that will best meet the needs of the American people.

I am now seeing your Service as a corrupt, power greedy organization. That hides behind its hypocrisy and uses its power to do as you like.

The propaganda that you present yourselves as protectors of wildlife. While at your back door you rape and destroy the very earth you proclaim too preserve. Your National motto is no longer

in preservation of wild
life. But instead, of how
much Capital can be
acquired. You have
Gone Out!

There must be a
stop to seeing nature
as industry alone.

The Environmental Rape
of this area is already
extensive. The Arguments
and facts for the trees and
against the logging are
many and varied. So
instead I call upon your
own natural instincts,
to preserve this National
Forest land for the benefit
of all.

Remember this many
will survive without the

all mighty dollar, but
man will not and
cannot survive with
out mother nature.
My views are not
mid Stream. I am totally
against any further
logging of the MH Butler
Dry Creek area.

Good day
Dena Rickford
P.O. Box 292
Sils, Oregon
97476

Letter No. 53

130 N. W. 114th
Portland, Oregon 97229
May 14, 1975

Siskiyou National Forest
P. O. Box 440
Grants Pass, Oregon 97526

Dear Sirs:

I am responding to the Mt. Butler-Bry Creek Planning Unit draft Environmental Impact Statement.

I am especially concerned about the plan to log in the Grassy Knob Roadless Area contained in the preferred alternative. I believe logging here would be the height of mis-management.

The valuable fishery and the steep, fragile soils of the region combine to insure that logging here would result in unacceptable deterioration of the valuable anadromous fishery.

The possibility of mass soil movement as a cause of stream sedimentation and siltation is a well documented phenomenon (Douglas N. Swanston, "Principal Soil Movement Processes Influenced by Roadbuilding, Logging, and Fire," in Proceedings of a Symposium: Forest Land Uses and Stream Environment [Corvallis, 1971], pp. 29-40; "Judging Impact and Damage of Timber Harvesting to Forest Soils in Mountainous Regions of Western North America," reprinted in Western Reforestation Coordination Committee, Western Forestry and Conservation Association (Portland, 1971) pp. 1-7; Slope Stability Problems Associated with Timber Harvesting in Mountainous Regions of the Western United States, U.S.D.A. Forest Service General Technical Report RM-21 (Portland, 1974), passim; D. N. Swanston and C. T. Dymess, "Stability of Steep Land," Journal of Forestry, Vol. 71, no. 5 (May, 1973), passim; R. C. Mesereau and C. T. Dymess, "Accelerated Mass Wasting After Logging and Slash Burning in Western Oregon," Journal of Soil and Water Conservation, Vol. 27, No. 3 (May-June, 1972), 112-114.). This phenomenon has occurred on the Siskiyou National Forest with disastrous results in the infamous case of the Bell Divide Road (Oregon Wildlife Commission, Northwest Regional Office, "Mass Soil Movement From Logging Roads - A Case History of the Bell Divide Road," reproduced typed ms., April 1, 1974). It is incredible that in the face of this empirical evidence, the preferred plan should be considered. I believe it to be in direct violation of the regional foresters' directive of November 19, 1974, requiring the protection of present fisheries from non-degradation (Forest Service Manual Chapter 2630.3, Emergency Directive No. 2).

Siskiyou National Forest---2

Several years ago, Phillip A. Briegleb, then director of the Pacific Northwest Range and Experiment Station, stated that each acre of a chinook producing stream produced fish worth \$6,200 per year. That is worth far more than the timber per year to be realized from the Grassy Knob Roadless Area, but you do not seem to realize this. (Briegleb, "Products and Opportunities Through Correlated Forest Use," in Western Forest and Conservation Association Proceedings, pp. 20-24, Dec. 4-6, 1968).

I urge that the Grassy Knob Roadless Area be added to the Chief's list of New Wilderness Study Areas and that the area remain roadless to protect the irreplaceable anadromous fishery there.

Yours Sincerely,

Paul Corkran
Dave Corkran

Info	X
Action	
Dist. D	
Supv.	
T. M.	
A. G.	
Lands	
Wildl.	
Waters	
SISKIYOU	
MAY 15 1975	
B & F	
Permit	
Recre	
Ad. Serv.	
Cont'g	
Purch	
Zone I	
Zone II	

247/11/14/14



CONSERVATION EDITOR

B. M. Bakke

May 15, 1975

COMMENTS ON

DRAFT ENVIRONMENTAL STATEMENT

MT. BUTLER-DRY CREEK PLANNING UNIT

SISKIYOU NATIONAL FOREST

Mr. William P. Ronayne, Supervisor
Siskiyou National Forest
P.O. Box 440
Grants Pass, Oregon 97526

Dear Sir:

Because no alternative in your E.I.S. adequately protects fisheries and wildlife, including your Proposed Action, I must oppose the existing alternatives and submit a preferred action of my own.

Wilderness:

The Wilderness Alternative, Alternative 1, protects the fishery and wildlife habitat that still exists on the Elk and Sixes Rivers best of all other alternatives. However, because of the Forest Service's strict interpretation of the Wilderness Act, an interpretation which does not allow the removal of non-man made disturbances such as land slides, the Wilderness Alternative would not accomplish the purpose of your E.I.S. and that of many other people - fish habitat protection.

Alternative 2:

Alternative 2 does not protect the watersheds of Rock and Anvil Creeks. A small stream side management unit is included but the headwall of both streams, their tributaries

Info	✓
Action	✓
Disturb.	✓
Supv.	✓
T. M.	✓
A. O.	✓
Lands	✓
Fire	✓
Wilderness	✓
SISKIYOU	✓
MAY 15 1975	✓
B & F	✓
Percent	✓
Reserve	✓
Ad. Serv.	✓
Cont'n	✓
Purch	✓
Zone	✓
Zone	✓

322-241/141
W. M. Bakke

and the canyon slopes of these streams are subject to timber harvest and to road construction. To protect these productive streams no timber harvest or road construction should take place in their drainage area.

The trail system up Dry Creek will only serve to make that stream too accessible and because of open country a trail is not necessary. A trail would only concentrate people and encourage angling which would result in unnecessary pressure on salmonid juveniles rearing in this important spawning stream.

The road system at the head of Dry Creek is already a problem and the road being proposed through sections 28, 36 and 12 would not protect fish habitat and should not be built.

Fishery value:

According to the Oregon Wildlife Commission: "Dry Creek, one of the two remaining unlogged tributaries to Sixes River, comprises only 16 percent of the total watershed yet produces 65 percent of the salmon and 25 percent of the steelhead and sea-run cutthroat trout that enter the Sixes River. Rock Creek, Anvil Creek and Red Cedar Creek produce over 30 percent of the coho salmon that utilize Elk River and collectively, contain over 7,700 square yards of spawning gravel".

At this point both the Elk and the Sixes Rivers have lost considerable productivity for salmonid species due to logging on private and Forest Service lands. The Butler Creek drainage has been totally ruined as a fish production stream. High water temperatures, silted gravel and low summer flows have altered these rivers to the point where the rearing habitat has been greatly reduced. As a result of high water temperatures, disease problems are a potential threat in both the rivers and in the Elk River Hatchery.

The remaining natural production must be protected in the Elk and Sixes Rivers. Any further losses of fish habitat cannot be tolerated. Any plan to develop forest lands at the expense of the fishery is negligence on the part of the Siskiyou National Forest.

Since the Planning Unit is characterized by steep terrain, slopes averaging 80 percent with some exceeding 100 percent, and unstable soils where 90 percent are classified as critical with high to severe erosion potential, it seems that logging and road construction are incompatible with fish habitat protection and to the management of a multiple resource base.

The USFS Region VI Fish Habitat Management Policy states: "In areas where soil conditions are judged to be so sensitive that roads cannot be constructed or that timber cannot be harvested by any logging system without degrading water quality below State standards or causing unacceptable fish habitat damage, the timber will be left standing and the area classified as unproductive, permanently inoperable, forest land."

Wildlife value:

The Proposed Action would reduce spotted owl habitat by 40 percent and cause problems for the bald eagle. Both of these animals are endangered in Oregon and must receive maximum protection on lands that are still suitable habitat. Alternative 2 with modifications to protect fish habitat will also give better protection for endangered animals.

Alternatives:

Any plans to develop the Mt. Butler-Dry Creek Planning Unit must have as its primary objective the protection of fishery values in Anvil, Rock, Red Cedar and Dry Creeks and the protection of endangered wildlife species. Your Proposed Action will not accomplish this and must be opposed. Fishery and Wildlife values can be protected in one of two ways.

Use Alternative 2 with the following modifications:

1. Place Rock Creek, Anvil Creek and Red Cedar Creek in the Roadless Recreation Area.
2. Delete the road proposed for the present route along the Graesy Knob Trail.
3. Delete the road proposed for the headwaters of Dry Creek.
4. Delete the trail system proposed for the Dry Creek system.
5. All timber removal and road construction activity in the Butler Creek drainage follow either the SMU Policy or the Region VI Fish Habitat Management Policy.

or

Place the Planning Unit in a backcountry state for ten years, remove it from the allowable cut base and develop an entry plan that does in fact protect the values of soils, timber production, fish and endangered species. This can be done by setting up a system for collecting physical and biological base-line data for soils, streams and wildlife, so that once entry is made the true impacts can be measured. Also a monitoring system carried out over at least ten years on other similar forest lands in the area should be done in order to evaluate improved entry techniques and designs planned for the Mt. Butler-Dry Creek Planning Unit.

Strong considerations should be given to protecting the Mt. Butler-Dry Creek Planning Unit as an ecological benchmark for the Southwest coastal area. This would provide data to evaluate impacts on other forest lands, it would protect a largely undisturbed area for research, and it would protect the limited fish and wildlife habitat remaining in the area.

Sincerely yours,

Don Baker

Letter No. 55

Dear Sir,

As an employee at the Elk River Salmon Hatchery for the past 7 years, I have a comment to make about the proposed small buffer zone to be left along Anvil Creek adjacent to the hatchery. Much of this drainage, probably 90% of it, has up to 90% slope. If it was logged as proposed in alternative 3, it would have (1) extreme blowdowns from the severe winter winds in this area in the buffer zone along Anvil Creek, (2) blowdowns coupled with other drainages severe slope would cause severe siltation to occur during the winter rains causing the death of what is Elk River #1 spawning stream. (over)

This Country has some fine timber in it and I know we will have to cut a large portion of it in order to get the wood products we need. However, considering what we and our descendants stand to lose if we don't protect streams such as Amiel Creek, Dry Creek etc., I think it is a small price to pay in logs lost to the market if you could just increase these buffer zones to at least a mile or more in length on each side of these streams in order to insure their protection. Thank you very much for your time.

Sincerely yours,
Craig D. Smith

Craig Smith
State Rt. Box 152
Port Orford, Ore. 97465

Letter No. 56

May 16, 1975

The Forest Supervisor
Siskiyou National Forest
P. O. Box 440
Grange Pass, Oregon 97526

Dear Sir:

I would like to comment on the Draft Environmental Statement for the Mt. Butler-Dry Creek Planning Unit. First of all, I feel that you and your staff did an excellent job in preparing the statement. The background information, explanations of the proposed action and alternatives, and statistical data seemed to be all well researched, objective, and complete. There also seemed to be a conspicuous lack of bias. This is really a report which a staff can be proud of.

Secondly, I would like to recommend that you and your staff reconsider the adoption of either alternatives one or two. This area is so fragile and sensitive that the least amount of development is desirable. Although the proposed action leaves the most fragile areas undeveloped, I feel that it would be best if all the presently roadless area were left undeveloped. I feel that it should also be studied for a possible future wilderness area. Oregon's and the nation's demand for wilderness in the future will increase, and this very scenic and rugged area could well fill part of that demand. Therefore I would strongly urge the adoption of alternative one; and, less strongly, the adoption of alternative two, as the management plan for this planning unit.

Finally, if the Forest Service rejects the adoption of alternatives one or two, then I would urge the final adoption of the proposed action. However, this proposed action should only proceed if the safeguards stated in the Environmental Statement are stringently followed. Soil erosion must be held to a very minimum, water quality must be maintained or enhanced, streambanks must be protected. Under no circumstances should alternatives four, five, or six even be considered. Development under these alternatives would be disastrous to the area. I would also urge that the areas left undeveloped by the proposed action be permanently treated in that fashion. The provision in the proposed action for possible future timber harvest in these areas should be omitted. All in all, I would again say that if alternatives one or two are finally rejected, then the proposed action (with one minor change mentioned above) should be the one followed in the management of the unit.

Info	✓
Admin	✓
Dist. D.	✓
Supv.	✓
T. M.	✓
L. O.	✓
Lands	✓
Eng.	✓
Fire	✓
Wild	✓
Other	✓
MAY 15 1975	
B. F.	✓
Person	✓
Rece.	✓
Ad. Serv.	✓
Plant	✓
Zone II	✓
Zone III	✓
Zone IV	✓
Zone V	✓
Zone VI	✓
Zone VII	✓
Zone VIII	✓
Zone IX	✓
Zone X	✓
Zone XI	✓
Zone XII	✓
Zone XIII	✓
Zone XIV	✓
Zone XV	✓
Zone XVI	✓
Zone XVII	✓
Zone XVIII	✓
Zone XIX	✓
Zone XX	✓
Zone XXI	✓
Zone XXII	✓
Zone XXIII	✓
Zone XXIV	✓
Zone XXV	✓
Zone XXVI	✓
Zone XXVII	✓
Zone XXVIII	✓
Zone XXIX	✓
Zone XXX	✓

Thank you for your consideration in sending me the draft Environmental Statement, and your consideration of my comments.

Sincerely,

David L. Hayteas

David L. Hayteas

P. O. Box 754

Winchester, Oregon 97495

Letter No. 57

Info	Adm. Serv.	Dist. B. D.	Y. M.	A. O.	Land	Eng.	Fire	Wildl.	Siskiyou	MAY 19 1975
B & F	Person	Reserve	Ad. Serv.	Cont'g	Purchg	Zone I	Zone II			

16 May, 1975

Forest Service
Siskiyou National Forest
Grants Pass, Oregon 97526
Forest Supervisor

Dear Mr. W.P. Ronayne:

In regards to the proposed Mt. Butler-Dry creek planning unit in Curry County, I would like to make the following comments.

Having been in the logging business a good part of my life, I realize that timber has to be made available to the logger in order to sustain a livelihood from such an occupation. I feel that the mature trees should be harvested from this proposed unit, but in such a way which will do the least damage to the fish and wildlife, that are in this area.

I'm sure that the Forest service has come a long ways in the past years concerning management of our timber resources, and I'm equally sure that they need to advance a lot farther before they are compatible with the other resources, which depend upon the environment that the forest provides them.

I'm in favor of the Forest service proceeding with caution, and to explore all available methods of timber harvesting before any decision is made to go ahead with their proposed plan # 3.

You can put me on record as favoring plan # 2 with modification.

Sincerely,

Bill Hunt

Star Rt. Box 150
Port Orford, Oregon 97465

MAY 19 1975

RECEIVED
MAY 19 1975
FOREST SERVICE

May 17, 1975

Dear Mr. Ronayne,

Well, I've read and reviewed your preliminary draft statement on the Mount Butler - Dry Creek Planning Unit. You've done a good job of gathering information on the planning unit and have organized the information in a clear and meaningful way.

Still, I don't understand how you can, in the light of your own research, propose alternative three as the option with the highest net public benefit. It seems obvious to me that your data shows this alternative too risky to implement - especially in regards to the importance of the planning unit on local fisheries.

Some very relevant data is missing in this report and, if at all possible, I'd like to see this data incorporated into your final draft.

① When reviewing a wilderness area for possible wilderness classification, the question "How much is enough" is a common and relevant one, to help the public

decide for themselves just how much wilderness is enough, more information is needed. A statistical table with the following information is, in my opinion, analysis friendly.

Here's the table I'd like to see and its

key:

	a	b	c	d	e	f	g
1							
2							
3							
4							
5							

a) total acres

key:

- ① Nation
- ② Continental U.S.
- ③ West
- ④ Region six
- ⑤ Siskiyou N.F.
- a) total acres
- b) acres in wilderness
- c) acres in new study class
- d) roadless areas*
- e) % wilderness in relation to total acreage (a)
- f) % new study
- g) % roadless

* 5,000 or more acres tracts or those to which no title is such
not including previously designated wilderness and new study areas.

(page three)

② I think that, considering the emphasis put on RARE quotients, you should show more information on how this ^{data} information is gathered and processed. General information on how such subjective topics as scenic value are rated would be nice. How would said evaluator rank a large stand of old growth Douglas fir as compared to a snow-capped peak surrounded rock fields in regards to scenic beauty value?

③ In your impact statement, you are asking the public to decide the soundness of your proposed action and this is impossible to do with out ~~some~~ ^{kind of} hard information as to what kind of success you've had on past cuts. A comprehensive evaluation of past actions is indispensable to any scientific management program that seeks improvement and this information should be assembled in a usable form.

The evaluation data should address itself to such concerns as (1) net public benefit (2) net profit (3) soil mass movement - ~~erosion~~ erosion. (over)

(4) soil fertility - mineral and humus content
(5) water quality (6) road quality (7) impact on wild life (8) impact on synchronous salmonids (9) visual impact (10) reproduction success (11) growth rate of reprod (12) impact of fire - food and brush removal methods - etc. References and general information on how data is gathered should be included.

As a suggestion, this data could be given on three (4) forest classes. The first would be all cuts in the Siskiyou National Forest (2) cuts comparable to the planning unit in elevation, soil stability and slope, (3) cuts comparable to planning unit in regards to rainfall - wind velocity (in other words western slope coastal influence) as well as soil stability, slope and elevation.
(4) Forest Service cuts in the immediate vicinity of the planning unit.

The cuts evaluated could be broken

up into time groupings - perhaps four.

① cuts made twenty years ago or more (before 1955), ② cuts made between 1955-1965, ③ cuts between 1965-70, and ④ cuts made between 1970 and present.

This time grouping will show what progress is being made in logging techniques in the Siskiyou National Forest.

I strongly feel a proper evaluation system of past ~~information~~ ^{data} is to be indispensable information for your management program as well as for public decision making. If such information isn't being gathered, evaluated, and used in an organized, ~~very~~ objective way, you are not learning from your successes and failures fully and are abusing the scientific method.

Well, there are three areas in which I feel more data is needed in this statement. All three points deal with important information necessary for decision making for unit planning.

Of the alternatives listed, I am in favor of alternative one. Here are some reasons why:

① I'm very concerned about the negative impacts all plans (especially alternatives 3, 4, and 5) except alternative one, may create

on the world-class fisheries resource with which this unit is remarkably endowed.

Of course, I'm talking about salmon and steelhead trout. They used to run up our rivers like crazy until logging and damming caused great reduction. About 1960, the low remaining population started holding its own, thanks largely to ~~artificial~~ ^{artificial} hatchery programs. We need to be almost overcautious with this extremely delicate resource. The combination of steep slopes, unstable soils, and high rains pose a grave threat to spawning beds.

Summer temperatures are already borderline and it's very questionable that logging practices in all but alternative one would raise ~~summer~~ ^{water} temperatures in the Elk and Siskiyou Rivers and their tributaries to the detriment of the salmon and steelhead population.

To further protect the fisheries resource of the planning unit, I think the timber harvest area and the critical management area of ~~the~~ ^{that} alternative one should have undisturbed buffers for all Class I, II, and III streams.

In your statement you seemed confident that you could, under proposed action management, protect the fisheries resource. I was skeptical and wrote the Oregon Wildlife and Fisheries Commission for their opinion. This organization is staffed with experts who have for years studied anadromous salmonoids and logging's effect on these fish. They seemed very unsure of your ability to manage alternatives 3, 4, 5 and not damage fisheries severely and even wanted modifications for alternative 2. Are you going to ignore their expert advice or will you pay heed to their warning.

③ This area is unique in that it's the only remaining large tract of roadless, coastal-influenced environment in an area and in making our National Forest. This coastal area is so cut-up with clearcuts and criss-cross roads. Can't we save this little bit of wild country.

④ Alternative one gives the best protection for the rare bald eagle and osprey and of all the alternatives, is the only one to give

adequate protection for the Northern Spotted Owl.

⑤ Alternative one saves the most old growth Douglas Fir habitat.

You repeatedly mention how timber harvest increases wildlife population and diversity of species but you fail to mention that there are lots and lots of clean cut type environment while old growth Douglas Fir forests are being destroyed systematically. It's save more Douglas fir habitat in its natural state.

It seems that much of the wilderness being set aside is poor timber site and that old growth Douglas fir sites are just too valuable to save. Remember what happened to the great Redwood forests of Northern California coast. It would be interesting to see some statistics on how much National Forest land is in the Douglas fir biome, how much of this is being preserved in its natural state and how this ratio compares to other, less dollar and cents valuable, biomes ratios.

(page 9)

② Clearly, anyone can see the skyrocketing rise in backpacking, wilderness recreation, wilderness appreciation, and general environmental concern. Alternative one addresses itself most fully to this important, substantial nationwide trend.

One can see just how strong this trend is by noticing the rise in backpacking clubs, rise in backpacking equipment sales, rise in membership of environmental organizations, election of pro-environmental politicians, and importance of environmental issues in recent elections, recent environmental legislation, national and state level public input to the Forest Service, other governmental organizations, agencies, politicians, etc.

Sometimes I wonder if the Forest Service is conscious of this trend, knows that public sentiment may soon perhaps after the next presidential election when Secretary Butz could be ousted) cause a change in policy in regards to wilderness and roadless areas and is now trying to diagonalize potential wilderness

areas by pushing roads into these areas quickly as possible.

We need more wilderness to meet the rising demand for wilderness recreation. And the existing areas are just going to be too crowded (running the wilderness, especially if we don't save lots more).

As the roadless areas get scarcer and scarcer, the remaining ones will become more and more valuable. I wonder if we stop to realize just how valuable these areas may become in ten or so years.

⑦ This area, due to its ~~and~~ critical soils, soil types, steep slopes, high rainfall, runoff, and winds is a very delicate piece of ground. I'm doubtful as to the units overall ability to regenerate and produce decent sustained yield if managed under alternatives 3, 4 or 5. And if it doesn't, it may ~~prove~~ ^{cost} prove to be an economic failure considering high rearing costs. Alternative one requires the lowest outlay of our public funds.

These are my seven major reasons for endorsing Alternative one.

I would still like to write a little more general discussion on this this unit and the impact statement.

Two main reasons are usually given to justify road and logging expansion in our National Forests. They are (a) the local economic gain in the form of jobs, tax revenues, individual and corporate profits, and general economic stimulation and (b) our responsibility to meet the Nation's rising demand for wood products. I'll discuss issue (a) first.

Your discussion on rural economy and its single industry tendency is very well explained. I believe the few jobs the proposed Action and Alternatives Fund would create are not important enough to justify losing this roadless area. Moreover, the local economy should be emphasized timber-related industry if we ever want a solid, multi-industry economy. The old 'put in a road and put up another timber sale' approach hasn't made our economy stable and isn't going to. What will eventually stabilize our

economy will require a change ~~and~~ away from timber industry employment into new ones. This change must happen slowly but should start immediately. It will require imagination, courage and probably a little self-tightening but will be for the long range good.

As far as issue (b), our responsibility to meet the rising national demand for wood products, the concept has perhaps already reached a point of diminishing returns. Sure, I want everyone to have a nice house - but two or three houses, each with double garages? The amount of wood and wood products our country wastes is phenomenal. Here are a few ideas on how we can help meet our nation's wood and wood products needs without sacrificing our few remaining roadless areas:

~~1. Private lease wood and wood products.~~
Makes it economically possible to recycle paper, containers, etc. Salvage all ~~leftover~~ with sound ~~usable~~ wood.

① Waste less wood - more efficient timber utilization on timber unit, at the mill, in wood products factories (paper mills, ~~factories~~), on building sites, etc.

② Recycling of existing wood supplies - Make it economically feasible to recycle paper (does the forest service use recycled paper?), containers, crates, etc. Salvage all buildings with sound, useable wood.

③ Stop exporting wood and cut down on exportation of wood products.

④ Generally stop squandering wood and wood products on super luxury items (like someone's third house) and trash (like the tons of advertising circulars everyone gets in the mail whether they want to or not and other throw away or burns).

⑤ Encourage private landowners to reforest and put back into productive management cut over lands. This will relieve the pressure to over cut our public lands. Oregon's timber tax discourages citizens from doing this. ~~The tax should be changed~~ The tax law should be changed so that taxes are

paid on timber, when it is harvested. Reforestation should be required all over the country so that we can reduce sending our

Douglas Fir forests back East to Chicago, New York City, and all the areas that have a need of liter, ated their forests.

⑥ Manage the timber producing areas that are already used accessed in a more efficient way to sustain a greater yield per acre.

Much more research and funds should go into exploring alternative ways outside of over cutting to meet our lumber needs. It's said that necessity is the mother of invention, and, perhaps, if we cut less wood and the price rises, we will be forced to waste less and develop some alternatives.

I'm a little confused as to what you mean in your paragraph on roading on page 41 (paragraph 5). Does this mean you plan to put main access roads in little by little or all at once? Please clarify what you are trying to explain in this paragraph.

(page 18)

In your report, you emphasize how the Proposed Action's damage to existing fisheries will be minimal (pg. 44, p. 3) and that overall, the Proposed Action balances environmental and socio-economic concerns without creating serious impacts to either. An evaluative report (as I recommended earlier in this letter) on your past efforts will shed some light as to whether this is a reasonable conclusion based on hard data or a dangerous and careless assumption based more on "wishful thinking" than on past experience.

Thanks for listening to my ideas and opinions. My hands about to fall off with I'll quit writing. Hope things are going well for all you folk - in the office and in the field. Bye for now.

Romain Cooper
10398 Takebma Rd.
Cave Junction, Oregon
97523

Letter No. 59

Cape Blanco Rt. Box 1
Sixes, Ore. 97476
May 18, 1975

Mr. William P. Ronayne, Forest Supervisor
Siskiyou National Forest
P. O. Box 440
Grants Pass, Ore. 97526

Dear Mr. Ronayne:

This letter is in response to the Mt. Butler-Dry Creek draft EIS. Many of us who live and work in this area are entirely dissatisfied with the alternative that the Forest Service has chosen. Public input was virtually ignored as more than 60 percent of the respondents disapproved of the Proposed Action. The advice of the state agencies that manage the fish and wildlife resources of this area was also ignored since the Fish Commission, and Wildlife Commission both supported Alternative 1 and 2 or more restricted versions thereof. Why has the Forest Service chosen to ignore this wide ranging opposition?

Existing roadless areas in Dry Creek and Elk River watersheds are unique, not only from a geological standpoint, but because they make up the last sizeable natural ecosystem in coastal southwest Oregon. At the very least, the Forest Service should postpone any decision to develop the roadless area for 10 or 15 years. There is practically no background or baseline information from which to measure the changes that will occur if the unit is developed. How does the Forest Service claim to be able to conform to the guideline in Appendix C (p. 94) on turbidity when there is less than one year

Info	✓
Action	✓
Distrib.	✓
Supr.	✓
T. M.	✓
A. G.	✓
Lands	✓
Engr.	✓
Fire	✓
Wildlife	✓
Siskiyou	✓
MAY 21 1975	
Person	✓
Resource	✓
Ad. Serv.	✓
Cont'g	✓
Purch'g	✓
Zone I	✓
Zone II	✓

W. P. Ronayne

of background data on Elk River and Dry Creek and none on Rock, Anvil, Red Cedar or Butler creeks? Turbidity is a very important factor in all of these streams. Because of the tremendous variations in flow and precipitation from year to year, it would take at least 10 years to obtain valid measurements of "natural stream turbidity" in these tributaries.

Many of the logging techniques proposed for this unit are relatively new.

These new techniques for logging, roadbuilding, and regeneration offer promise of decreasing environmental damage to streams and soils in the future, but these methods should be thoroughly tested and evaluated in areas adjacent to the Planning Unit before any entry is made into this roadless area. At least 10 years, and probably 15 years should be required to thoroughly evaluate new methods referred to in the EIS.

I have observed two units on the south fork of Lobster Creek that were skyline logged from near ridgetop roads within the past few years. Soil disturbance was less than with other commonly used methods, but part of the buffer strip had blown down into the creek and a small slide had occurred high in the unit and carried all the way to the stream. Overall, the Lobster Creek units looked good compared with most other units in the area, but problems had occurred within two years of logging. What will happen to these units 5 - 6 years from now when the root systems of cut trees have decomposed? How well will regeneration take place with the undisturbed understory still present? How well will these new types of roads hold up over 10 or 15 years? The point that I am trying to make is that, at this time, scientists in the Forest Service simply do not know for sure what the long term effects of these new systems will be in a sensitive area like the Mt. Butler-Dry Creek unit.

The EIS states that the environmental impact of timber harvest with conventional equipment and road construction in this area "was unacceptable from a fisheries standpoint." (p. 21) To enter this sensitive roadless area at this time using new, relatively untested, methods is like proposing to undertake a giant uncontrolled experiment with the resources of this unit at stake. These resources are much too valuable for such an experiment.

I urge the Forest Service to postpone making any final decision on the land use plan for this unit for 10 - 15 years. The roadless areas should be maintained in their current state and should not be used in determining the allowable cut for this district.

Alternative 1 is the only acceptable alternative of the six outlined in the EIS. Designation as a new wilderness study area would insure that all of the resources of this unit are carefully studied and evaluated before any final decision is made.

As a fishery biologist, I have worked in the Mt. Butler-Dry Creek area for the past 5 1/2 years and am quite familiar with the fishery resources discussed in this EIS. After thoroughly reviewing the EIS, I feel that the document is a reasonably clear and concise statement of the problems and resources of the unit. However, there are many weak points and some inaccurate statements. The following comments pertain to specific sections of the EIS in the approximate order that they appear in this document:

1. P. 3, paragraph 3, "Precipitation averages 85-90 inches annually...."

This is not an accurate statement. Weather station Port Orford 5E is located at Elk River Hatchery directly adjacent to the S.W. portion of

the Planning Unit. The average annual precipitation for the four complete years of data (1971 - 1974) since the station began operation in January 1970 is 136.0 inches ¹. Precipitation over much of the Planning Unit, especially the higher elevations, may be even greater than the 136 inch average at the hatchery because of the orographic effect that these higher elevation areas have on storms as they pass over the Unit from west to east.

2. P. 19, paragraph 2, "... the Planning Unit encompasses 22 percent of the Elk River watershed and, assuming that fishery values are evenly distributed within the drainage, approximately 22 percent of the total fishery value (\$271,000) can be attributed to the Planning Unit. The assumption is defensible based on knowledge of the condition of the watershed and distribution of fish...." I don't agree with this statement. Fishery values are not evenly distributed within the drainage. Rock and Anvil creeks are far more important to salmonid production than are any other tributaries within the watershed. Large numbers of returning hatchery salmon do not enter the hatchery holding facility. A high percentage of these fish spawn in Rock and Anvil creeks along with substantial numbers of wild salmon. The Fish Commission spent \$1,325 in 1972 to construct a spawning channel in the lower section of Anvil Creek. This work was done so that Anvil Creek could accommodate larger numbers of spawners, and to help increase survival of eggs deposited by these spawners. 2.

In 1972, a peak density of 1,027 spawners/mile was recorded for Anvil

1. "Climatological Data, Oregon," Annual Summary 1971, 1972, 1973, 1974. National Climatic Center, Asheville, N.C.
2. Personal communication - William G. Mullerkey, Fish Commission of Oregon.

Creek compared with 147 spawners/mile for Bald Mt. Creek, which had the highest density of any Elk River tributary not included within the Planning Unit. In 1973, a peak density of 1,220 spawners/mile was recorded for Anvil Creek compared with 56 spawners/mile for Bald Mt. Creek, which again, had the highest density of spawners for that part of the Elk River system not within the Planning Unit (Table 1).

Total peak counts for each stream may be more relevant than spawning densities for comparison purposes because Rock and Anvil creeks both have spawning areas limited to one half mile or less. However, average peak counts (1971 - 1974) for Anvil Creek (.3 mile) are still more than eight times as high as Bald Mt. Creek (.3 mile) or Panther Creek (1.2 miles) and twelve times as high as a one mile section of upper Elk River (Table 1).

There is evidence to suggest that Anvil and Rock creeks were the most valuable tributaries even before the hatchery began operations. A Fish Commission report describing the life history of fall chinook salmon in Elk River, 1964 - 1969 states, "Fall chinook salmon also spawn in at least eight tributaries in varying numbers. Rock and Anvil creeks have shown the greatest spawning densities...." "On January 12, 1965, a survey showed a peak live count of 71 chinook adults and 10 chinook jacks in the lower kilometer of Rock Creek." "...the highest peak count recorded in Anvil Creek is from a Game Commission survey on December 20, 1966. This count showed 72 chinook adults and 12 chinook jacks were present in the lower one half kilometer of Anvil Creek." 3.

3. Bender, R. E. 1970. Life History of Fall Chinook Salmon in Elk River, 1964 - 1969. Coastal Rivers Investigation, Information Report 70-10. Fish Commission of Oregon, Research Div. Memo, 20 p., pp. 9-11.

Anvil Creek is made even more important by the fact that it has been used as an egg source for Elk River Hatchery since 1968. It was still being used to collect a portion of the hatchery egg take in 1974 and will probably be used again in the future.

The data I have presented support my contention that fishery values are not evenly distributed within the drainage. Instead, streams originating in the Planning Unit supply a disproportionate amount of the spawning potential for the Elk River system and are critically important to the success of the hatchery and its programs. The fishery value attributable to the Planning Unit within Elk River drainage should be estimated at somewhere between 40 and 60 percent (\$491,480 - \$737,370) of the total value for Elk River fisheries.

3. P. 21, paragraph 5, "However, recently more sophisticated road construction and timber harvest techniques have been used elsewhere on the Sitkiyou National Forest. These applications have demonstrated that road construction and timber harvest activities need not result in serious problems of this nature." These "new methods" have not been thoroughly enough tested to gamble with the valuable resources of the Mt. Butler-Dry Creek unit. Are there sites receiving more than 135 inches of precipitation annually with 90 percent critical soils and slopes frequently exceeding 100 percent where these new methods have been tested over a period long enough for complete regeneration to have taken place and road stability to have been proven? Has the Forest Service extensively tested lined uphill falling on sites like those found in the Mt. Butler-Dry Creek unit? Has helicop-

Table 1. Spawning Survey Counts for Selected Areas of Elk River watershed. 1.

	Most Important Spawning Streams Within Planning Unit				Most Important Spawning Streams Outside of the Planning Unit					
	Rock Creek		Anvil Creek		Bald Mt. Creek		Panther Creek		Upper Elk River	
	Peak Count	Fish per mile	Peak Count	Fish per mile	Peak Count	Fish per mile	Peak Count	Fish per mile	Peak Count	Fish per mile
1971	NA ^{2.}	NA	NA ^{2.}	NA	19	63	35	29	13	13
1972	19	38	308 ^{3.}	1,027	49	147	21	18	29	29
1973	55	110	366 ^{3.}	1,220	18	56	37	31	NA ^{4.}	NA
1974	66	132	132 ^{3.}	410	32	96	11	9	6	6
Average	47	94	269	607	30	90	26	22	16	16

1. Unpublished data, Fish Commission of Oregon
2. These streams used for hatchery egg take most of the season. Totals of 157 and 365 salmon were handled in Rock and Anvil creeks respectively.
3. Used partially for hatchery egg take. This probably reduced counts.
4. No surveys conducted. Water high and turbid in the main river most of the season.

Area Surveyed:

Rock Creek - Lower 1/2 mile
Anvil Creek - Lower 1/3 mile
Bald Mt. Creek - Lower 1/3 mile
Panther Creek - Lower 1.2 miles
Upper Elk River - 1 mile - Butler Bar to Milbury Cr.

ter logging been proven economically feasible on sites where there is no Port Orford Cedar; where most of the logs have to be flown uphill to landings with windy conditions prevalent and where many sales require flying the logs one mile or more? Have the projected dramatic increases in the cost of fuel and national fuel conservation goals been taken into account when evaluating proposed helicopter logging? These questions need to be answered.

4. P. 37, Management Objectives. "1. Management activities must protect and, where practical, improve water quality for fisheries and other uses." This is not a realistic subobjective. The roadless areas already have extremely high water quality. Under the Proposed Action, the only direction water quality in these areas can go is down.

5. P. 38, Management Objectives. The body of the EIS is consistent with these objectives except that objective 9 stating that, "The mix of management activities must efficiently use existing budget levels to produce a greater level of total public benefits." isn't even a possibility without some means of assigning realistic values to the non-consumptive resources of the Unit. What is the dollar value of the spotted owl population? Distinct dollar values are provided for fisheries and timber resources but only vague values are provided for non-consumptive resources. These non-consumptive resources will always come out second best, unless some realistic method is developed for assigning a dollar value to them.

6. P. 40, Proposed Action. Up to this point, the EIS provides a reasonably sound and concise statement of the resources of this Unit and the pro-

blems to be encountered if the Unit is developed. With this information and the management objectives and constraints set forth on Pp. 37-38, it is incomprehensible how Alternative 3 was chosen as the Proposed Action. All through the body of the EIS, many valid reasons are given for not choosing the Proposed Action.

I cannot see how the Proposed Action can possibly comply with the management constraints (referred to as subobjectives, p. 37) of "protecting and maintaining the existing soil resource" or of "assuring rapid regeneration and high utilization of the site." As stated earlier, these capabilities must be thoroughly demonstrated in adjacent units with equal risk factors before any decision is made to enter the Planning Unit.

There are too many areas on the forest where no merchantable timber is being regenerated on logged over lands. It is a Forest Service policy not to cut timber where rapid regeneration is not possible, and yet, the Elk River drainage has many examples where this policy was not adhered to. Why can't the Forest Service demonstrate some of its new regeneration techniques on these units before attempting entry into another high risk area?

The Forest Service states that the 5,600 acre Fisheries/Wildlife area (p. 40) will be managed to provide near-maximum protection to the existing fisheries, wildlife, and aesthetic resources. This statement is misleading and not accurate. The two main fish producing streams within or adjacent to this area are Red Cedar and Anvil creeks. The entire upper half of the Red Cedar drainage is in the intensive timber manage-

ment area and Anvil Creek will only have a small 1/8 mile buffer strip in the lower third of its drainage. How can this be considered "near-maximum" protection?

The statement (p. 40) "The Fisheries/Recreation area contains much of the land and water with the greatest fisheries, aesthetic and primitive type recreation potentials in the Unit." is misleading from a fisheries standpoint. All of Dry Creek is very important as far as fisheries are concerned. If water quality (especially turbidity) deteriorates in the upper segments of the drainage, the effect and deterioration will be felt all the way to the mouth of Dry Creek. One major slide or failure in upper Dry Creek could cause a substantial reduction in survival of salmonid eggs and alevins in the gravel in the lower two miles of this stream. At high winter flow levels, each part of the watershed is equally important as far as turbidity is concerned.

7. P. 41, Proposed Action. The EIS's brief coverage of the 30 mile road system (paragraphs 4 & 5) proposed for this Unit is grossly insufficient considering the statement on the next page (paragraph 5), "Studies cited by the President's Advisory Panel on Timber and the Environment indicate that an overwhelmingly large percentage of the accelerated soil erosion in timber harvest areas can be attributed to roads." Specifically, what types of roads and roadbuilding techniques are planned for this Unit? Have these been thoroughly tested in similar high risk areas over a period of ten years or more? I question the cost that you have assigned to this road system. Is this cost based on current values or on projected values 2 to 5 years from now when construction would begin if

the Proposed Action is carried out? What are the alternatives if the 1.8 million dollars in funds for the roads are not appropriated?

8. P. 42, Environmental Impacts. Many factors are well quantified in the inventory section of the EIS, but the section on Environmental Impacts is almost devoid of quantification. The word minimize doesn't really say anything. Erosion could be minimized and still be unacceptable (p.42). Secondary and tertiary impacts could also be minimized but still be unacceptable.

9. P. 45, paragraph 2. The EIS states that (in relation to spotted owls), "Few, if any, individuals will exist outside of either the Fisheries/Wildlife or Fisheries/Recreation areas." Little of the old growth, canyon type environment, preferred by the spotted owl, exists within the Fisheries/Wildlife Area. In addition, Elk River Road runs directly adjacent to the southern boundary of this area and either roads or the lack of proper environment could eliminate the spotted owl from this entire Planning Unit. It is unlikely that any spotted owls will remain in the Fisheries/Recreation area with the proposed trail system along the creek bottom and the proposed road systems and logging activities in the higher areas.

10. P. 45, paragraph 3. The EIS mentions the use of herbicides only briefly. Regeneration problems may be common on this Planning Unit because most logs will be felled free of the ground with only slight disturbance to the understory vegetation. This will make planting seedlings difficult and native vegetation will compete with these seedlings. What degree

of herbicide use will be necessary? What guidelines will be used for herbicide application and what type of herbicides will be used? What will be the effects of large scale herbicide applications on wildlife and fisheries?

11. P. 48, paragraph 1, Summary of Probable Adverse Environmental Effects which Cannot be Avoided. I don't agree that the impact on fisheries and soil erosion will be small to insignificant. What specific (quantitative) level of significance is the Forest Service referring to?

12. P. 49, paragraph 2. I question the statement, in reference to spotted owls, "... that 40% of the present carrying capacity will be sustained." for reasons already stated in # 9 of my comments. What the EIS doesn't point out, is that in a few decades there will be no habitat for this species or for many other species requiring stands of old growth timber anywhere in the region except for the few areas set aside from logging, and most of these contain little old growth timber.

13. P. 49, paragraph 3 In reference to bald eagles, "In addition, 3 - 4 snags per acre can be left in harvested areas to provide perch sites, food sources, and potential nesting sites." Would these snags actually be left? Leaving snags is often dangerous to tree fallers and state safety regulations may preclude any snags being left in many areas. These snags are extremely important, however, not only for eagles but for a great variety of birds that depend upon them for nesting and/or food. Some provision should be made to insure that there will be 3 - 4 snags left per acre if the Unit is developed.

14. P. 53, Alternatives to the Proposed Action. Alternatives 4, 5, and 6 are not realistic alternatives and should not even have been included in this EIS. Alternatives 4 and 5 are not consistent with the stated overall management objective or with the "subobjectives" listed on pages 37 and 38. With no protection for Anvil or Rock creeks and only minimal protection for Dry Creek, Alternatives 4 and 5 could not possibly protect the existing fisheries or soil resources. (subobjectives 1 and 2 Pp. 37-38). These alternatives would sacrifice all other resources in the Unit for one use, timber harvest. Alternative 6 is not realistic because the high values of all the resources in this Unit are totally neglected. Careful land use planning is a necessity if the overall management objective is to be met.

This leaves only Alternatives 1, 2 and 3 as realistic possibilities. Five or six alternatives should have been developed within the range covered by Alternatives 1 - 3.

Alternative 1 is a reasonable and realistic alternative and should be retained.

A second alternative, which would postpone making a decision on the land use plan for this Unit for 10 - 15 years, should be added. Under this alternative, development could continue in Butler basin, but the roadless areas of the Unit would remain undeveloped for the 10 to 15 year period necessary to allow for thorough evaluation of new logging, road building and reforestation techniques.

A third alternative, similar to Alternative 2 (p.58), but with all of

Anvil and Rock creeks' watersheds included in the Fisheries/wildlife area should be added. I could accept any of the above three alternatives but prefer the first one.

A fourth alternative allowing for some development in the Dry Creek watershed, but maintaining Elk River tributaries (including Anvil and Rock creeks' watersheds) within the Fisheries/wildlife Area should be added.

The Butler basin area would continue to be developed as in Alternative 2.

A fifth alternative would be similar to the Proposed Action, except that all of Rock and Anvil creeks' watersheds would be included within the Fisheries/wildlife area.

And, the sixth alternative would be the same as the Proposed Action. However, I do not support above alternatives 4, 5 and 6 for reasons mentioned throughout this letter.

Whatever the Forest Service decides, Anvil and Rock creeks deserve complete protection. The fishery values of these streams are so high that they should be managed as fishery production areas. These watersheds will still be supporting multiple uses such as wildlife and recreation, but the greatest net public benefit will occur only if development is precluded and the fishery values are maintained at their current very high levels.

15. P. 57. The statement that almost all of the 362 citizen inputs tend to concur with the conclusion that wilderness quality within the Planning Unit is not better than mediocre is ridiculous. I can only find 13 res-

ponses (Pp. 115 - 117) that specifically mentioned wilderness quality and nine of these felt that the area was unique. Grossly inaccurate statements such as this tend to destroy Forest Service credibility. In the seven or eight years that I have had contact with the Forest Service, I have noticed a distinct bias against wilderness within the Forest Service. Statements like the one referred to above just confirm that this bias exists.

16. Pp. 78, 79. The Forest Service requested comments on this EIS from nine state sources. Comments were requested from Oregon State University School of Forestry but not from Oregon State University Department of Fisheries and Wildlife. Why? The Department of Fisheries and Wildlife is a well recognized source of expertise and has done a considerable amount of research on the effects of various types of forest management on fishery resources.

17. P. 94, Appendix C. The standards set for turbidity and temperature are impressive except for the clause at the end of each of these which states, "...except for certain short-term activities which may be specifically authorized.... and which are necessary to accomplish legitimate use or activities where turbidity/temperature in excess of this standard are unavoidable." What specific activities are being referred to? These two very important standards are meaningless without further qualification. There are certain times of year when any increase in turbidity or temperature would be unacceptable from a fisheries standpoint. The Forest Service must be more specific in this and other areas if they expect the public to be able to provide meaningful input into the decision making process.

Port Orford

May 18/1975

To summarize, the EIS contains a well written reasonably accurate inventory section which details the high value of the non-timber resources; it details the extremely fragile nature of these resources; and it sufficiently documents the risks of development in the Unit. However, in the case of assigned resource values, one finds that some of the resources are treated in terms of their dollar value while others are dealt with only in vague, unquantifiable terms. The Proposed Action is then selected and defended in terms of dollar values. Environmental impacts are treated in a very imprecise manner with little quantification. Terms such as "minimize" and "maximize" are used far too freely (Pp. 42,43,44,45 & 50). In my opinion, the Proposed Action is poorly defended and not justified by the information presented in the EIS. Again, I will state my choice of Alternative 1 as the only acceptable alternative presented in this EIS.

In closing, I feel the Forest Service is making a determined effort to improve its timber harvesting techniques and should be commended for this action. I hope that this will be followed by improved Forest Service management of the rest of the forest resources along with an increased awareness of the values of these resources. I hope, also, that the Forest Service will seriously and openmindedly consider all public input since it is the public's resources that are being managed.

Sincerely,

Reese E. Bender

Reese E. Bender

RB:arb

cc: Theodore A. Schlapfer, U.S.F.S.

Robert W. Phillips, U.S.F.S.

Senator Bob Packwood

Senator Mark Hatfield

Representative Jim Weaver

Governor Bob Straub

Ronald W. Hasselmann, Fish Commission of Ore.

Oregon Environmental Council

Fred J. Swanson, U. of Oregon

Dear Sirs;

I am writing in regard to the Mt. Butler-Dry Creek planning unit and wish to express my opinion on the subject.

I am not in favor of completely restricting harvest of timber, but feel the way the choices are set up to give protection for our fisheries and other resources this alternative is the only one that will provide adequate protection. If better protection of Dry Creek Anvil Creek Rock Creek and their small feeder streams were given, I think #2 alternative would be acceptable. The problem with the way #2 is set up I feel silt loads would increase greatly in these major Salmon spawning streams. Also because of exposure of small feeder streams now protected by the buffer strip afforded the main streams (dry creek

Letter No. 61

ROUGH AND READY LUMBER COMPANY

P.O. BOX 380

TELEPHONE 2301
DAVE JUNCTION, OREGON 9752

Info	
Acting	
Dist. B	
Supv.	
T. H.	
A. G.	
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9752	

May 19, 1975

Mr. W.P. Ronayne
Forest Supervisor
P.O. Box 440
Grants Pass, Oregon 97526

Subject: Mt. Butler-Dry Creek
Planning Unit

Dear sir:

I have reviewed a copy of the impact statement on the Mt. Butler - Dry Creek Planning Unit on file in the Illinois Valley library. It pointed out in the statement that timber produced jobs support over 50% of the economy of Curry County and recreation and tourism is second. I believe that alternate 3 provides the best balance to meet the needs of the dependent communities.

Yours very truly,

Lewis Krauss

Lewis Krauss

Anvil Creek (etc) water temp would be raised in the trib. streams as well as the main river. These increased temps. could very likely have adverse effect at the Elk River Hatchery as well as causing evaporation bringing about reduced stream flows. This again could be detrimental to the hatchery as well as irrigation for farmers further down stream.

I therefore am opposed to all alternatives from 3-5. I could accept #2 if ~~further~~ farther protection were provided for tributary streams such as, Dry Creek, Anvil Creek, Rock Creek etc. IN the event no changes can be made to alternative #2, then I would have no choice but to favor Alternative #1

Thank you

Sincerely
Hyle D Curtis

Letter No. 62

May 19, 1975

Forest Supervisor
Siskiyou National Forest
P.O. Box 440
Grants Pass, Oregon 97526

Re Mt. Butler-Dry Creek
Planning Unit

Dear sir:

I have read sections of your statement and plan for future management of this area. It seems to me that you are being too optimistic about thinking the tourist and recreation industry will keep on expanding. If Congress ever does anything about the Energy Crisis, gasoline will be too expensive, or in such short supply, that fewer, not more, people will be able to get to this area. I think your alternate plan #3 provides all the Fisheries/Recreation area that can ever be utilized properly and support it.

Yours truly

Fred Krauss
Fred Krauss
Selma, Oregon

Letter No. 63

May 19, 1975

Sirs:

This is in respect to the question of the Dry Creek-NW Butler area's future. I think logging this area, so close to my family's home and being one of the few old growth forests around us (we've ~~watched~~ watched and listened to the chainsaws, trees falling, and garden all spring, up and down the Sixes River.) I wish to express my feeling that this old forest remain as it is and be a sanctuary for wild things, one of the extremely few untouched forests around. I want my son, whose 11 months old now, to be able to see what our hills used to look like before business came in and wiped it all out, all the big old trees. I'd like him to be able to see Creeks and rivers that aren't clouded by soil erosion, like the ones we live by, Elephant Rock Creek and the Sixes. I'd like him to be able to go to the Uke River and fish for salmon when he's older. And he's already been walking, on our backs, through the moon mountain range.

Info	✓
Action	✓
Distrib. D	✓
Supv.	✓
T. M.	✓
A. O.	
Lands	
Eng.	
Fire	
Wildlife	✓
SISKIYOU	
MAY 21 1975	
B & P	
Person	
Rescue	
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Zone II	

11/1/75

Respected Sikes

As part of a growing community on the upper Sikes River land in the interest of wilderness preservation I would ask you who have the power to please prevent the sale of any part of the Butler Bar Dry Creek planning unit.

As a back-packing hiker I've visited the area many times in the last three years. Up and down all the major drainages of Dry Creek; Across the Moon Mountain Range to the clearcut section 36, and around Butler Bar to Dry Creek. It is my opinion that the many endangered species of wild life now seeking refuge in those forest would be gone forever if we allowed the destruction of that last remaining portion of Old Growth Forest.

Two question that I have that indeed I would like answers to:

Why is absolutely necessary to keep cutting the virgin forest when there is so little of it left in the first place?
Why do we keep selling those forests when the will of the people is so against it.

Thank you for Casproville
Elephant Rock Community

I believe this forest area should be left untouched so that there will be some monument, some reminder around here to what it used to be like.

I can see all around my home the effects of logging, the sliding land, nothing holding it down, sliding into the creeks and rivers and washing away the topsoil. There's certainly been enough logging around this area, not much more big trees left and its about time to forever that something else has to be done, were running out of trees.

Well, I expect I've made it clear that I want the land and forest and waters to grow and continue life.

Thank you
Pamela DeWitt

Dr. Sikes
Sikes, Oregon
9/7/76

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Contg	
Purchg	
Zone I	
Zone II	

May 19, 1974
11805-79th Ave So
Seattle, WA 98178

Re: Draft EIS on Mt. Butler Dry Creek
Planning Unit

① Your plans to log extensive areas is not the best land use. Logging resources and wilderness status, receive further consideration.

② wilderness value has been neglected in your study

③ economic costs have been under-estimated

Please give your draft further consideration
Please put me on your mailing list

Sincerely,
John & Nancy Woodley

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MAY 23 1975	
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Purchg	
Zone I	
Zone II	

861 So. 12th
Coos Bay, Oregon
May 20, 1975

Mr. William P. Ronayne, Supervisor
Siskiyou National Forest
P. O. Box 440
Grants Pass, Oregon 97526

Dear Mr. Ronayne:

I would urge you to re-consider your choice of management plans for the Mt. Butler-Dry Creek Planning Unit, for the following reasons:

1. Your own evaluation of the fisheries resource would indicate that it is in danger. Water quality of both Sixes and Elk Rivers has been dangerously lowered due, at least in part, to intensive logging activity. The clean water from the undisturbed portions of the unit would seem to me the major sustainer of the fish at this time. Your reference to "sophisticated" methods of logging, with "minimal" effect on the watershed, is not definite enough to be re-assuring. Also the possibility of eventual erosion of lands logged by these methods is a considerable factor, in my opinion. Several more years of observation of these methods on adjacent lands should be utilized before any further action is taken.

I am particularly concerned with the smaller tributaries of Dry Creek, which flow from areas you have planned for "Timber Management". I have yet to see any timber management which has given full protection to these small streams.

2. The soil in the Planning Unit is too unstable for logging and re-planting, in my opinion. Your own study shows 90% of the land to be "critical soils." The conclusions of Fred Swanson, geologist with the University of Oregon, agree with yours. The possibility of efficient regeneration should be thoroughly studied on adjacent lands with similar soils, before ~~before~~ any thought should be given to further logging in this area.

3. The cost of road building in the unit would be too high, in proportion to the value of timber which could be harvested within the foreseeable future. I would rather see my tax dollars spent on accelerated re-forestation of prime timber lands. I object to financially subsidizing development of any kind which could, according to your own study, damage the water quality even slightly.

In conclusion, may I point out that you have suggested a "Fisheries-Wildlife Area" to protect the south slopes adjacent to Elk River. I feel that the more timbered northern slopes merit the same protection, for the above reasons. Nothing less than Alternate #1 can accomplish this.

Thank you for your consideration.

Sincerely Yours;
James H. Sherman

Letter No. 67

50PLY

SOUTHERN OREGON PLYWOOD, INC.

Manufacturers of Quality Plywood

P.O. Box 269, Grants Pass, Oregon 97526 TELEPHONE 303 476-6681



May 20, 1975

Forest Supervisor
Siskiyou National Forest
P. O. Box 440
Grants Pass, Oregon 97526

Dear Bill:

I have studied your environmental impact statement on Mt. Butler - Dry Creek Area, and find that I am basically in agreement with your proposed action. I feel that it is based on sound management policies.

Although I agree with your final proposed plan, I must point out that I have sharp disagreements as to the presentation of some of the basic data. In close scrutiny on that portion of the report dealing with the fisheries (pg. 15-23), I find a comprehensive study and projection as to the economical value of the fishing industry. If this type of study is to be included in a portion of the study, it should remain consistent throughout the report. I am, of course, referring to the incomplete economical study of that portion of the report which deals with the timber values, direct and indirect in harvesting the timber crop.

In this report, I have added my own values as to the economic impact of a timber harvest and still come up in agreement with your proposed plan.

If there is any question as to this letter, please feel free to contact me.

James L. Lawrence
Assistant Manager

Letter No. 68

May 20, 1975

Forest Supervisor
Siskiyou National Forest
P. O. Box 440
Grants Pass, Oregon 97526

Gentlemen:

After reviewing your draft environmental statement on the Mt. Butler - Dry Creek planning unit, I have decided to support your selected plan for management of the area.

I think you have properly considered the values involved and have allowed proper management with safeguards to protect all the resources.

I was happy to see that logging will be severely limited in the fisheries-wildlife area. I think this area along Elk River should be maintained in its present conditions. I know we need the timber, but still we have to consider other values.

Thank you for the opportunity to comment on your statement.

Yours truly,

Geneva M. Oran
Geneva M. Oran
3764 Rogue River Hwy.
Grants Pass, Oregon 97526

Gmo

Info	✓
Action	✓
Distrib. D	✓
Supv.	✓
T. M.	✓
A. O.	✓
Lands	✓
Engr.	✓
Fire	✓
Wildshed	✓
SISKIYOU	✓
MAY 21 1975	
D & F	✓
Person	✓
Rescue	✓
Ad. Serv.	✓
Cont'g	✓
Purch'g	✓
Zone I	✓
Zone II	✓

W/ add

Info	✓
Action	✓
Distrib. D	✓
Supv.	✓
T. M.	✓
A. O.	✓
Lands	✓
Engr.	✓
Fire	✓
Wildshed	✓
SISKIYOU	✓
MAY 21 1975	
D & F	✓
Person	✓
Rescue	✓
Ad. Serv.	✓
Cont'g	✓
Purch'g	✓
Zone I	✓
Zone II	✓

W/ add

WEBCO LUMBER, INC.

William P. Konayne
Forest Supervisor
Siskiyou N. F.
P.O. Box 410
Grants Pass, Oregon

I have looked over your Environmental Impact Statement on Mt. Butler-Dry Creek Area and am basically in agreement with your proposed action.

I don't think you've given enough emphasis to the Economic Impact of the timber involved. You've only listed the value of the stumpage and finished products with no consideration of payrolls, supplies and other values involved. I note you have done this for the fisheries section and I feel you should do the same for Timber.

Overall, I thought the statement was well prepared and showed your interest in balanced management for the Siskiyou Forest.

Sincerely,
Larry F. Bluhm
Larry Bluhm

Info	✓	MAY 22 1975
Action	✓	
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16024 WILLIAMS HIGHWAY — GRANT'S PASS OREGON 97526 — PHONE 846-6565

PHONE 846-6565

GRANTS PASS, OREGON 97526

:6024 WILLIAMS HIGHWAY

Sincerely,

Daniel E. Small

Dan Small
160 La Clair
Coos Bay, Oregon May 20, 1975
97420

Letter No. 70

Mr. W.P. Ronayne, Forest Supervisor
Siskiyou National Forest
P.O. Box 440
Grants Pass, Oregon 97526

Dear Mr. Ronayne:

As a concerned citizen, I am responding to your recently released Draft Environmental Impact Statement on the Mt. Butler-Dry Creek Planning Unit of the Siskiyou National Forest.

Many points listed in the Draft EIS need to be spoken to. First of all is the desire and recommendation of the Forest Service that many acres in the planning unit be logged. The evidence in the EIS seems to say that the soils of the area are too unstable and should therefore be left alone. However, you still recommend logging a great portion of the area. This seems to me a contradiction.

Although you cite "more sophisticated" logging methods that you claim will not destroy the soil integrity of the area, I am not yet convinced that these "so-called" logging methods are good and will not speed up erosion. I think the logging of areas next to the planning with the new methods need to be examined over about a 10-year period before any environmental judgment can be made on their success. Then, if the methods have proven successful, we could re-consider their use on the Mt. Butler area. But, on information before me at this time, I would support "no" logging in the area, thus alternative 1, presented before the draft EIS was written.

Another point regarding logging that needs to be answered is:

Can the Mt. Butler-Dry Creek areas proposed for extensive logging be reforested? Don't other areas of adjoining lands now remain barren? If these lands are extensively logged, they may never produce worthwhile trees again.

Another point of great concern to me is the fact that the fisheries potential of the area would be seriously damaged by extensively logging, because of the great amounts of debris spreading into the rivers and streams of the area, making the more turbid than they already are. Now can the fisheries resource survive without an adequate watershed? If the fisheries resource of the area is destroyed as it may be if you implement your proposed plans, what beneficial impact will there be to the area without the fisheries potential?

The final point I wish to make regarding the draft EIS on the area is that it seems public opinion regarding proposed alternatives for the area was almost totally ignored in producing the draft EIS. The majority of responses supported leaving the area in its natural state--people like myself, conservation orientated as well as loggers and many other individuals. The area is very sensitive in nature and must not be destroyed for future generations. It is my opinion that if you extensively log the area as you propose, the Mt. Butler-Dry Creek unit will be lost to erosion and slides for all of time. There will never be a good stand of timber on this fragile soil again.

I hope you consider the public input regarding the Draft EIS with more weight than you seem to have given it before preparing your report. Please give the area a chance. It's not too late to change your proposals for the area in drafting your final EIS.

May 21, 1975

Letter No. 71

Mr. W. P. Ronayne
Forest Supervisor
P. O. Box 440
Grants Pass, Oregon

Dear Mr. Ronayne:

I was in attendance at the public meeting held Tuesday, May 20, at the Port Orford Elementary School. There are several topics which I heard and several which were not mentioned. The one outstanding topic I heard mentioned by many at the meeting was the lack of the copies of the publication concerning this Planning Area. Probably seventy-five per cent of the people present had not seen or heard of the bulletin. Would it be possible to extend the deadline and provide a central distribution point for more of the publication and additionally, schedule another meeting in about two weeks after the people have had an opportunity to read about all of the alternatives? Very possibly, we all might be in favor of alternative Three if we all had an opportunity to know more about the other alternatives.

People living in this area are as a whole familiar with the concept of trees being a crop to be harvested. Some are not completely knowledgeable about O & C monies and their effect upon our taxes. You seemed to bypass the young woman who asked you about this aspect of the Planning Area. More information regarding this could come forth in the paper or at a meeting you might schedule in the near future. We are not against logging but that it be done in the right way to do the least damage in the various areas.

Since I live on Elk River, the fishing happens to be my concern. I remember three years ago when ill-supervised logging did a tremendous amount of damage to the river, the hatchery, the spring run, and the fall run of fish. The river was so muddy and filled with debris from March through November that practically no fishing could be done that whole time. As far as could be determined by any agency, there was literally, no spring or fall run of salmon. Extreme damage was done at the fish hatchery. Incubators in the hatchery were filled with silt and debris. The egg trays had to be handled at least once in every 6 to 8 hour periods around the clock to keep from killing the hatching eggs. At this stage in hatching, any movement could be disastrous. Bags full of pine needles, leaves, small twigs, etc. were scraped out of the trays. While the gravel in the river bed usually acts as a filter, it became so plugged with silt that the natural filtering system no longer worked. This is, I realize, not your responsibility. Why could it not be? You are proposing logging in this area and without a doubt will be blamed for any muddy waters coming down the river. No one will bother to go up stream to find out who is the guilty person. Only the Planning Committee will bear the brunt of criticism. If some way you could arrange to have some influence or control over what is done even by another agency of the government, your job and your Plan would be assured. Help us in setting some cooperation and I feel sure we will help you.

Thank you for arranging the meeting. Hopefully, before you make your decision we can have another meeting in which you can answer some of the concerns I am sure you have received in letters sent to your office.

Fern J. Haight
Elk River Road
Port Orford, Oregon

Sincerely, Fern J Haight

Letter No. 72

William G. Mullarkey
Rt. 1 Box 83B
Brookings, Oregon 97415
May 21, 1975

Mr. W.P. Ronayne, Forest Supervisor
Siskiyou National Forest
Grants Pass, OR 97526

Dear Bill:

The proposed action for the Mt. Butler-Dry Creek Planning Unit would be acceptable with the following modifications:

1. Increase the width of the leave strip on Dry Cree from 1/8 mile on each side to 1/4 mile. This would provide additional protection to Dry Creek and the fisheries resources as well as a wider zone for recreational development and needed habitat for the northern spotted owl.
2. Postpone entry into the west side of the Planning Unit for 5 years to allow collection of background information (temperature and turbidity) on the major streams and tributaries.
3. All primary roads should be black topped which would increase stability and reduce erosion.
4. Complete entry in the Butler Creek drainage by constructing ridge top roads, directional felling, and aerial yarding. Proceed with reforestation to determine success.
5. Proceed with caution after all factors have been evaluated.

May I suggest that you conduct public tours through the Planning Unit to show and describe new techniques after their completion.

Sincerely,

Bill

William G. Mullarkey

Info	✓
Action	✓
Dist. D	✓
Supv.	✓
T. M.	✓
A. & S.	✓
Adm.	✓
Ext.	✓
Files	✓
W. H. S.	✓
Stamp	✓
MAY 22 1975	
B & F	✓
Permit	✓
Recon	✓
Adm. S.	✓
Costs	✓
Finance	✓
Zone 1	✓
Zone 2	✓

W. G. Mullarkey

DEAR SIR,
PLEASE DON'T CUT
DOWN THE TREES
ON MT. BUTLER.
THEY ARE NOW
PART OF A RARE
COASTAL FOREST
WHICH WE SHOULD
PRESERVE - LET'S
GET LUMBER FROM
A YOUNGER FOREST.
SINCERLY YOURS,
MATTHEW GATES.

MATTHEW GATES
P.O. BOX 503
SIXES
OREGON

Mr. W. P. Bonayne
Forest Supervisor
P. O. Box 440
Grants Pass, Oregon

Dear Mr. Ronayne:

after attending the meeting at the Port Orford Grade School Tuesday, May 20, I felt it imperative to write you concerning the Butte Mountain Planning Area. If your decision is to use Alternative Three as your experts said, my letter will be of no use to you. If on the other hand you are willing to consider some additional suggestions, then, I would like to make some.

The timber industry seems to be the main concern of most people, as well it should, and of the Forestry Department. New methods of logging were presented to us, only one of which has been tried in this area, helicopter logging, and been proven ecologically successful. Having personally seen skyline logging on Poverty Ridge and Grassy Knob, I would not consider it ecologically successful there. Creeks and streams were ruined, erosion channels were created, and re-forestation was not successful. Evidence was presented to us that tree planting is only successful in falling two trees out of every three fallen. The one tree continued to the bottom of the canyon, but first, doing irreparable damage. Having presented these observations why would it not be both feasible and politically advantageous to set aside a small area to try the three methods of logging mentioned before making a firm decision? After trying all three, you may decide to continue using all three methods in addition to the conventional methods but in the appropriate places. Please consider a trial period and make the public informed of what you are going to do.

To residents of Port Orford, fishing has been the second means of a livelihood. Due to foreign fishing and previous stream damage in some places, the salmon were rapidly disappearing. Now, with the Elk River Hatchery we can begin to see some hope for the return of the salmon. Presently, seventy-five per cent of the salmon being caught by our local fishermen have been spawned at the Elk River Hatchery. As stated by Dr. Paul Reimers, it would take very little sebrin in the water to ruin the operations at the Hatchery. Would it be possible to divert a portion of Elk River for use by the Hatchery while you carry out your plans? Since both organizations are part of the government service taxpayers support, why can you not so arrange your budgets to re-inforce each other? Having worked in a county service organization, I know such budgeting for re-inforcement within separate departments is highly possible and is constantly being done. It only takes cooperation on the part of both organizations. The Hatchery budget presently does not have funds to put in new filtering and cooling systems. Maybe the diversion of your budget for game management might be diverted to assist the Hatchery, temporarily.

The third means of a livelihood is tourism. Although some mention was made about camping sites and wilderness areas, very little was said about the pros and cons of such development. It is no idle speculation in the damage to wildlife, streams, and forests when areas such as Elk and Sixes River are opened up with black-topped roads. Will there be a ranger station with its supporting personnel to protect the public from the lack of knowledge we all have concerning what is ecologically bad practices? Will there be sufficient fire look-outs to cover the

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Mr. Renayne
Page 2

whole area with the supporting personnel and equipment, if this area is opened to the extent paved roads would provide? We have seen what happened at Calloquin when dirt roads were replaced by pavement and the original primitive area was managed by the Forestry Department. The headwaters of the Williamson River became heavily polluted. Wild life disappeared due to the heavy influx of humanity. Household pets who went along on vacations completely depleted the small animals and birds. Deer and bear moved out due to the heavy traffic and many campers. Can you present to us, the public, a more detailed plan for providing for these potentialities?

Thank you for spending your valuable time in reading this very long missile.

P. O. Box 64
Port Orford, Oregon

Mr. W. P. Ronayne
Forest Supervisor
Grants Pass, Oregon

If your decision is to use Alternative Three, disregard my letter. If you are not firmly committed to Alternative Three, please read on.

Now for the subject of fishing! I feel sure the public knows you are trying to protect the fish hatchery and its operation. What they are concerned about is that your roads will open up other tracts of timber to private bidders. Since you do not have any control over these private bidders at this time, they can do very much as they please. I am not talking about the large companies such as U. S. Plywood and Weyerhaeuser Company. I am talking about the small operators who log one tract and move on, never more to be heard of. They do not care what they do to the streams because they know that they can not be found, once they have finished their operation. If they should be found, they pay their fine but do not repair the damage. Is there some way you might generate some control over these people? Could your agency in some way make the ties between your organization and other organizations more cooperative? The public watches budgets enough to know there are more than one agency with monies budgeted to do a similar job but due to lack of communication, each goes his way many times re-doing what has been done before and sometimes undoing what has just been done. Combining budgets or, rather, budgeted monies in a cooperative venture could get twice as much done in a shorter period of time. How about adding a member of the Elk River Fish Hatchery to your group to act in an advisory capacity as well as a link in your communication system with the public and other organizations.

Tourism opens up many problems with an uneducated public. Your whole concept of a wilderness area can easily be ruined without

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Craig	
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Zone I	
Zone II	

Letter No. 76

May 21, 1975

some controls. People like to take their Hondas, Snowmobiles, and family pets with them to wilderness areas. Unless there is some form of patrolling by some one with authority, the public can not only hurt themselves but the whole environment. Are there going to be check points to check people in and out? Are there going to be Forest Rangers? Are there going to be Fire Patrol Stations? None of these questions were asked or answered at the meeting. These are items for considerable thought and planning. I do hope you can see fit to extend the deadline as well as arrange at least another meeting with a possible agenda to be printed in the local paper. The agenda might be made from the many communications you probably have had and will be receiving.

Sincerely,

Wayne P. Thomas
Port Orford Mach. & Mfg.
Port Orford, Oregon

Wayne P. Thomas

Wayne P. Thomas
Port Orford Mach. & Mfg.
Port Orford, Oregon
97465

Mr. W. P. Ronayne
Forest Supervisor
P. O. Box 440
Grants Pass, Oregon

Dear Mr. Ronayne:

The meeting at the Grade School was quite enlightening to me. Views, ideas, and suggestions presented there lead me to write to you expressing my own viewpoint.

It would seem that there has not been sufficient distribution of information concerning just what you propose to do and how you propose to do it. I can find no fault with any of the first three alternatives if each were to be handled in an appropriate manner.

A trial period of logging in various areas to find the best method, if any, seems not without merit. Some very knowledgeable loggers were present who have spent some time in this area and seemed to have shown better methods in various terrains. Their services could be most helpful, if you so wished to use them on a type of advisory basis.

Dr. Paul Reimers, having been with the fish hatchery since its inception, is most knowledgeable about what will and will not affect the operation of the hatchery. Since our local fishermen are now catching, commercially, the first results, he has been here long enough to know what will and won't work in this location. Members of the local hatchery crew would be most helpful to you. In our association with these people we have always found them not at all unreasonable, but quite the contrary. Cooperation on the part of both of your organizations both financially as well as information-wise would, I feel, produce an unbeatable team to be looked on by other sections of the country. Try it, you might like it.

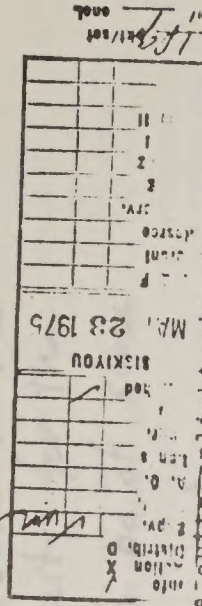
Due to the state of the economy, we will probably have to depend upon the tourists for the greatest part of our economy for some time. We want these tourists to find beautiful places to see, wonderful wilderness areas to visit, and interesting things to do. Your plans provide for these things. In spite of all of this, I'm worried. None of your plans or alternatives provide for supervision of these tremendous assets. Have you considered this but did not feel it would be of any concern as yet? Maybe, with a possible five years to actual implementation you felt there was plenty of time to get around to this area of the Plan. Would it be possible to schedule another meeting to cover some of the areas of concern I feel sure you have had correspondence about?

Port Orford will be looking forward to hearing you and seeing you again. Thank you for a very informative evening.

Sincerely,

Wayne P. Thomas

Mr. Varney Farris
Elk River Road
Port Orford, Oregon



Letter No. 77

P.O. Box 557
Port Orford, Ore.
97465
May 21, 1975

United States Forest Service
Siskiyou National Forest

re: Mt. Butler-Dry Creek Planning Unit

The recent public meeting at Port Orford revealed much concern that all natural resources be carefully considered in a sustained yield plan and I heartily agree. That I have doubts about is the political pressures that inevitably arise in administering the plan. Some special interests will want too much timber cut and others will want a wilderness area.

One of the pressures already apparent is the plan to use helicopter logging. Where helicopter sales have been made in the past, stumpage prices were very low. The bids reflect monopoly. These low prices constitute a giveaway of a public resource. I am aware of the arguments for such logging, but if timber cannot pay its own way it should not be logged. There is no excuse for privileged treatment in the administration of our federal forests.

Vance Noble

Vance Noble

Info	✓
Action	✓
Distrib.	✓
Supv.	✓
T. M.	✓
A. O.	✓
Lands	✓
Engr.	✓
Fire	✓
Wildlife	✓
SISKIYOU	
MAY 23 1975	
G & F	✓
Forest	✓
Recreation	✓
Wildlife	✓
Range	✓
Game	✓
Wild	✓

Approved
[Signature]

Letter No. 78

May '75

Forest Supervisor

& Colleagues

Hello

I'm writing with concern over the Dry Creek watershed (Grassy Knob Roadless Area) which is as close to me as the ridge-top behind my cabin.

I'm definitely in favor of utilizing this area for its wilderness value for all time; and I mean from the ridge-tops to the streams all the way to where Dry Creek enters the Sixes River.

There's no foreseeable design for harvesting its timber without costing the U.S. Forest Service agency as much as sales would return.

The lives and livelihood of the people in our area (Salmon fishers, marginal farmers, retired workers, recreation officers) and the people welcome to come here and enjoy what they think

²
is precious (sportsmen/women, vacationing families, nearby workers and the unemployed, scientists, etc.) would be forever changed for the worst by the loss of this forest.

Summary: cost to federal agency; cost to our lives here in the valley and seacoast — it doesn't add up to good.

Also I'd like to voice a different matter in this communication; it involves your knowing who I am and what I can do in the future; hopefully with your attention.

My home on the N bank of the Sixes is very near what we call Moon Mountain ("logging") Bridge. The road from the Dry Creek ridge-tops that comes in to the Sixes River Road just downstream from Elephant Rock Creek

³
is an important access route to the wilderness preserve. Publicity for the forest will enable me to be of some service.

I will pursue this opportunity on my own initiative and resources to provide, absolutely free, for the needs of some of the people coming to enjoy the forest:

① I will be available to answer questions and draw maps in order to prevent some of the dangers and hardships that families might encounter.

② And I am investigating the prospect of maintaining a small, free, "improved" campground (for families, with tents) near my cabin, at least during the peak camping season.

③ I welcome the opportunity to discuss

4
these matters with you and i would
welcome some channels whereby
people could be referred to my facilities
for their use.

A Personal Note:

Environmental disruption is rampant.
your agency needs (in my opinion) to respond
to short-sighted pressures & procedures
of today with action, shaping a new
role between the system (or U.S. Congress)
and the consumers. (We all gotta change
for you to help!!)

As individuals, i urge you to take to
your heart the human pleas of some
of your fellow citizens — using that
cosmic energy to help you fight for the
very best procedures your experience
and imagination can conceive.

Thanks, Barrie Stout
Sincerely, Box 236, Siskiyou, Or. 97476

Letter No. 79

May 21, 1975

Mr. William P. Royman, Forest Supervisor
Siskiyou National Forest
Supervisor's Office
P. O. Box
Grants Pass, OR 97526

Dear Bill:

I've been writing this in my mind for many days and now that I touch
pen to paper somehow I don't believe it will be as good as my thoughts on
the subject have been.

Anyway, concerning the Mt. Butler-Dry Creek draft E.I.S., may I first
congratulate you and your staff on the final copy and its format. It is
readable and understandable for the most part which can be attested by
those students of mine who have read it and commented to me about it.

To comment intelligently about it, one must look at the whole process
of how the public was involved and for that we should start with the work-
shop conducted on the SWOCC campus over a year ago. In my opinion, that
was one of the finest presentations I've ever seen the Forest Service put
on. Everyone had an opportunity to learn about the area and grasp a feel
for the terrain and problems without ever having to be physically present
on the ground. The presentation of slides, movies, graphs and diagrams
made overwhelming testimony to the fact that this area was not just another
piece of Siskiyou National Forest to be plugged into an allowable cut
formula. What the meeting told me was that here we have a critical, del-
icate, unstable area where some tough decisions need to be made. Through
the education process the public and the Forest Service were forced to
"think" and determine what kinds of alternatives were available and real-
istic. It was a two-way exchange and both conservationist and logger
joined together (perhaps a first?) and discussed the issues without "put-
ting down" each other. For this, I commend you highly.

Next came the brochure, which I understand was a courtesy and not a
legal requirement, and again I applaud such action. Many responded, over
300 I'm told, which attests to its validity.

As I read the E.I.S. I became somewhat confused. The reason being I
was simply mystified as to why this alternative was selected after all the
dangers were pointed out during the initial workshop.

Life	✓
Action	✓
Distrib.	0
Supv.	✓
T. M.	
A. O.	
Lands	
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Fire	
Wildlife	✓
Siskiyou	
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Forest	
Service	
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It is my understanding that from the alternatives, the Forest Service is expected to synthesize the opinions to formulate another alternative (perhaps x?) which would not necessarily resemble any of the five original choices. Apparently this did not happen as obviously alternative three was chosen.

My fears for the proposed course of action are based upon the following observations:

1.) There is obvious apprehension by fisheries biologists with regard to the protection of Elk River and its upper source streams. I have canoed the Elk River and I feel it is a beautiful and precious river whose integrity should not be threatened.

2.) Geologists have also indicated extremely unstable soils in most of the planning unit. This was also demonstrated by U.S.F.S. 8mm film shown at SWOCC during the original workshop. Foresters were shown sliding down shifting, gravel slopes with very steep grades.

3.) The timber values in the planning unit do not reflect high volumes per acre and the high cost of road construction would challenge economic feasibility of logging this area. One must consider high annual maintenance costs on such an unstable area.

4.) The volumes per acre stated on page 29 of the E.I.S. did not give the "mean" volume per acre, standard deviation or "sampling error". However, on another page such specifics as GBA10 is mentioned.

5.) The E.I.S. report mentions such safeguards as the "most sophisticated" logging methods and road construction techniques (p. 23) but never mentions what these methods and techniques are. This is an obvious oversight. Different methods can make big differences on any logging show.

6.) The brushy slopes all along the Elk River on private land are indicative of the tough reforestation problems. The private land within the planning unit itself has had only marginal results from re-stocking efforts. We are no longer in a situation in which we say we "think" we can reforest. We have acres and acres of unstocked, previously logged areas in which our efforts to reforest have failed miserably. We need not venture forth on areas where reforestation efforts are marginal or in doubt.

Therefore, in my opinion, the Mt. Butler-Dry Creek planning unit should be managed with extreme caution. Although I do not advocate a wilderness

area, I believe before any logging or road construction is begun, a test area be set aside to prove to the public that the theories in the E.I.S. are valid. This roadless area has waited for management for over 75 years and a few more years will not make any difference. The credibility of the Forest Service in managing this area for the highest and best use will be watched carefully.

I appreciate the opportunity to comment on this area and congratulate the Forest Service for their efforts on behalf of the public interest. In the final analysis that interest may be to set this area aside for its intrinsic value as a "control area" to measure management policies in surrounding areas.

Sincerely yours,

Bill Lemoine

Bill Lemoine
Coordinator, Forest Technology

Southern Oregon Community College

COOS BAY, OREGON 97420

RL/sac

Letter No. 80

United States Forest Service
Siskiyou National Forest
Post Office Box 440
Grants Pass, Oregon 97526
May 21, 1975

Dear Sirs:

I was in attendance at the Forest Service hearing held at Port Orford, Oregon last night, regarding the Butler Bar Dry Creek timber issue. I have three comments to make.

(1) At this point in time, I am extremely anxious about the survival of the Elk River Fish Hatchery. The head of the hatchery, Dr. Paul Reimers, commented last night that the logging being done near the Elk River on Forest Service land and private land is causing severe rises in the sedimentation and water temperature.

Will you guarantee me, as a citizen of the area, that your proposed logging of Dry Creek and Butler Bar will not further jeopardize this very delicate situation? What I am asking is that the Forest Service will absolutely promise, in legal form, that if any problem arises in the logging undertaking that will affect the river ecology, all operation will cease immediately and not resume until the problem has been corrected. I am not satisfied with a verbal promise that "we will of course monitor the effect on the river". I would be satisfied with the Fish Commission monitoring the logging effect and being able legally to stop operation if it becomes necessary to protect the fish.

I am not opposed to logging in the area, but I feel this area is being used as a "guinea pig" to "prove" theories; further the budding careers of Forest Service professionals and provide revenue for a sagging Federal economy. If you, the Forest Service, succeed in all these areas everyone will be happy and your prestige will be greatly enhanced, but if it fails, we who live in this area will be the ones who suffer, not the Forest Service. You will just write it up in one of your remote offices as "unavoidable ecological disaster caused by the unpredictable winds and heavy rainfall in the area".

It has been well publicized in numerous national and state communications medias about the disaster of Port Orford Harbor with the shoaling as a result of the Corps of Engineers "theories". This community should not have to suffer yet another disaster. This is why I want legal assurances from the Forest Service that a disaster will not occur. Unless I can have that, I will be most definitely against any logging on any Forest Service lands that will affect these rivers.

(2) I am a member of Port Orford's Comprehensive Planning Unit

and have seen the forecast for future trends in the economy in our area. According to our data, forest harvest and related industries are phasing out rapidly and commercial fishing is declining. The trend is towards tourism and its related sports fishing. The very life of our commercial fishing as well as tourism and sports fishing is largely dependant on what happens to the Elk River Hatchery. I don't feel I have to spell out to you again my concern with the logging proposal.

(3) My third comment is directed towards your "public relations people".

The "public hearing" was held in this town last night, at the citizens request, two days before the deadline for citizen input to the Forest Service and two days before the Forest Service will make its decision on the future of Butler Bar Dry Creek. When your people were questioned as to why we, the city under whose nose this plan is to be implemented, had not been consulted for input; we were told that one and one-half years ago the local school district was contacted about having a meeting in the local school. Apparently it was not terribly convenient for the school to relinquish a meeting area at the time you requested so the matter was dropped by your people. I would suggest that for the future your Public Relations people be instructed that the normal procedure, in any city, in public issue matters would be to contact either the City Offices or the City Chamber of Commerce rather than the School District. I am sure that either of these two groups could have found a building for you to hold your meeting in. The impression left by your action certainly has not done anything for creating confidence in your organization.

To summarize my recommendation to you:

I would favor logging of Butler Bar Dry Creek Area, IF the Oregon Fish Commission monitors the Elk and Sixes Rivers and has the complete power to close the logging operation at any time they feel the river ecology is endangered and the power to open the logging operation at such time as the problem has been corrected.

Sincerely yours,

Ellen A. Warring
member, Port Orford Citizen's Advisory
Committee for Comprehensive Planning
Box 811

CC: Oregon Fish Commission
Senator Packwood
Congressman James Weaver
Environmental Protection Agency
Common Cause
Ralph Nador

Info	✓
Action	✓
Distrib. D	✓
Supv.	✓
T. M.	✓
A. O.	✓
Lands	✓
Ecology	✓
Fire	✓
Wildlife	✓
Water	✓
Other	✓
Slack/You	✓
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Records	
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Zone XXIII	
Zone XXIV	
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Zone XXVII	
Zone XXVIII	
Zone XXIX	
Zone XXX	

May 21, 1975

P.O. Box B

Port Orford, Or. 97465

Mr. William P. Ronayne

Supervisor, Siskiyou National Forest

Post Office Box 440

Grants Pass, Oregon 97528

Dear Mr. Ronayne,

I'm writing to let you know that I am not in favor of Alternative 3. The impact study points out because of already critical water temperatures in Elk River and steep highly erosive land in the unit, relatively new logging techniques will be needed to protect the watershed from further damage. By the Forest Service's own admission it is clear that many of these new techniques are based on theory and not based on demonstrated proof. Therefore, I feel that Alternative 1 or Alternative 2 should be used until sometime in the future when these logging techniques are proven beyond doubt to be successful in this type of terrain. This Planning Unit is too important economically to use it experimentally. I feel that the Forest Service has not given adequate weight to the economic value of the many ranches in this area-- a 3/4 million dollar business was only given two sentences in the impact study. The Oregon legislature is now studying the proposal to make the entire city of Port Orford an historical site. This fact was not even mentioned in the impact study, although it would add greatly to the tourist business of the area.

Date	May 23 1975
Action	Dist. D
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A. O.	
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Forest	
Wild	
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Zone XXVII	
Zone XXVIII	
Zone XXIX	
Zone XXX	

The Forest Service held no public meetings in Port Orford to discuss the Planning Unit with the local people until three days before the deadline for receiving comments. Even then the meeting was not announced in the local newspaper, and the Forest Service appeared only at the request of the local Chamber of Commerce. Doesn't the Forest Service have a legal responsibility to hold advertised public meetings in the area most affected by their actions? There were no copies of the Environmental Impact Study available from the Forest Service at the public meeting. It was explained to me that most of the copies had been sent to assorted governmental agencies. I can only assume that the Forest Service doesn't want it to be read. It has also come to my attention that many planning commissions in the area received copies of the EIS after they had already taken a position. As operator of a tourist business in the area, I do not want to be in the position of having to tell my customers that the Forest Service is using experimental methods in this area. From talking to hundreds of tourists, it is clear to me that they value beautiful unspoiled trees and canyons and rivers even though they themselves may not have the youth to enjoy them to their fullest. Beautiful scenery is this area's best advertisement. Lets have more facts and experience before we risk destroying something that is vital to the growing tourist industry in this area.

Sincerely,
Townsend W. Dillingham
 Townsend W. Dillingham, owner and operator of

Toby's Treasures, Port Orford, Oregon

Copies to: Senators Packwood and Hatfield

Congressman Jim Weaver

Oregon Fish CommissionEnvironmental Protection Agency

Info	Action	✓
Distrib.	D	✓
Supv.		✓
T. H.		✓
A. O.		
Lands		
Engr.		
Fire		
Washed		
SISKIYOU		
MAY 22 1975		
B & F		
Permit		
Basco		
Ad. Serv.		
Contg.		
Purchg		
Zone I		
Zone II		

Edward C. Wall
1103-A SW Spruce
Grants Pass, Oregon
21 May 1975

Forest Supervisor
Siskiyou National Forest
P.O. Box 440
Grants Pass, Oregon 97526

Dear Sir:

I commend you on the position you took in your environmental impact statement for management of the Mt. Butler-Dry Creek area.

I would have preferred a higher emphasis on timber production and feel that to often today's sophisticated logging systems are underestimated in regards to the end product or environmental affect. For this reason I feel we could log most of the area without permanent damage to other resources.

Again let me commend you and your staff on the position your took in the management of this area.

Sincerely yours,
Edward C. Wall

Rt 1 Box 723-A
Gold Beach, Oregon 97444
May 21, 1975

Forest Supervisor
Siskiyou National Forest
P.O. Box 440
Grants Pass, Oregon 97527

Info	Action	✓
Distrib.	D	✓
Supv.		✓
T. H.		✓
A. O.		
Lands		
Engr.		
Fire		
Washed		
SISKIYOU		
MAY 22 1975		
B & F		
Permit		
Basco		
Ad. Serv.		
Contg.		
Purchg		
Zone I		
Zone II		

Dear Mr. Ronayne:

I would like to express my opinion concerning the Mt. Butler-Dry Creek planning unit. I strongly disapprove of your proposed action.
I support alternative two with the modification of extending the Fisheries/ Wildlife area to include the entire Anvil Creek and Rock Creek drainages.

My reasons are:

- Any logging or road building in this very sensitive area will accelerate soil erosion.
- Any clearcuts in the Anvil Creek, Rock Creek or Dry Creek drainages will accelerate run-off. This will cause floods in winter, and lower river levels with higher temperature in the summer. This would probably be the fatal blow to the already critical fish habitat in the rivers and at the hatchery.
- Regeneration will be very difficult.
- Northern Spotted Owl habitat should be retained.

I would like answers to the following questions.

- What methods will you use to gain regeneration?
- Why did you not have an alternative that would withdraw the Mt. Butler area from intensive timber management until it is proven that all units there can be successfully reforested. Or on the other hand, why was this already roaded area included in the planning unit with roadless areas?
- How much will it cost to build all the roads you propose?
- Why did you ignore the scientific information you received?
- Why must there be any logging in these roadless areas when there is so much to lose?

May 22, 1975

W. F. Ronayne
Siskiyou National Forest
P.O. Box 440
Grants Pass, Oregon

Dear Mr. Ronayne:

This letter is in response to the Mr. Butler-Dry Creek draft of your impact statement. Let me tell you a little about myself so you will understand why I feel about this as I do. I come from a family who has lived in the Snake area for a century. My father was born and raised on the river and still lives there today. Nobody knows better than people like us what effect logging activities can have on the river and surrounding area. The only thing that is keeping Snake River from drying up is Dry Creek.

In reading this statement it is evident that Dry Creek and its tributaries are in great danger if the PROPOSED Action remains to be the chosen alternative. Because of the steep slopes and 90° artificial coils, erosion will not only cause an immediate affect but will also occur for many years following. That area is particularly subject to severe coastal wind and heavy rains. Now you "sophisticated logging operations" (which aren't fully explained) prevent topsoil erosion and root rot after the forest floor cover is destroyed? I hope you don't expect me to believe that you can successfully reforest this area after knowing the conditions as I do. All one has to do is look at the roads and logging units at Butler Creek.

What about the non-timber resources and the effect on them? The **ACTION** in no way adequately provides protection of the fisheries resource. The Elk River hatchery is operating successfully under minimum bad conditions due to turbidity and water temperature levels. Dry Creek is the only decent spawning area left on the Sixes River and Alternative 3 in no way adequately protects it. An 1/3 mile on each side is very little. If this **ACTION** is allowed the fisheries resources will be practically destroyed in both rivers. Even a layman such as I can understand this.

Who is going to benefit from the PROPOSED ACTION? If helicopter operations are used they will have to be imported and they bring their own crews in so that will not create new jobs. Where is this timber going? It will not be

Sincerely,

Jerry P. Becker
Jerry P. Becker

cc: Senator Packwood
Senator Hatfield
Representative Weaver

-2-

processed in the local mills as they are no longer in operation due to economic conditions. It is doubtful that they will reopen. I cannot see that there will be any beneficial impact on the residents of this area in this proposal.

I want to take this time to make a comment on the availability of this statement. In Port Orford one man was given 2 copies when he requested 25 to distribute to local citizens. I asked for 5 and received 2 with a statement that the libraries would have copies. The libraries in the Coos Bay area had not received copies at that time but were sent some after I pointed this out to you. Even at the Port Orford hearing on May 20 many people had not had a chance to read or see the statement.

"What real role does public input have on your decision? The analysis of public response shows the people overwhelmingly favor alternatives 1 and 2 over the PROPOSED ACTION. How can it be that Alternative 3 remains in your favor? Is it because the opinions of the forestry experts override the opinions of the people? This is part of the Siskiyou National Forest and belongs to the public and our voice need to be heard. I have attended meetings where experts in fisheries and geology fields outside the forest service feels that there is more need to protect the land than your proposal offers.

Now I would like to give you my response. I strongly favor Alternative 1 as it is the only plan that protects the natural ecosystems. It would be my first choice but I feel Alternative 2 allows for adequate fisheries protection and adequate timber management which to me is a real compromise. Dry Creek in particular needs more than 1/4 mile buffer strip because the erosion alone can take over that but we must also foresee what wind will do when it has a chance to get in there too. I in no way support the PROPOSED ACTION. I believe it is a threat to the survival of the rivers and the economy that they provide to the people of that area. The public response has shown that the majority who had responded before feel much the same way I do. Please reconsider your stand in this matter for those of us who stand to lose the most.

Sincerely,

Mary F. Wademan

Mary F. Wiedeman
1630 Underwood

Coos Bay, Ore. 97427

[illegible]

Blackfield
poorhouse

L. E. Day

W. P. Ronayne, Forest Supervisor
Siskiyou National Forest
P.O. Box 440
Grants Pass, Oregon 97526

Dear Mr. Ronayne:

This letter is a response to the Draft Environmental Impact Statement prepared by the Siskiyou National Forest for the Mt. Butler-Dry Creek Planning Unit. We have each written a personal letter to express in detail our concerns and opinions about the proposed management of the unit. We also feel that it is worthwhile to offer some comments as a group because we represent a broad spectrum of technical backgrounds and we have strong, common feelings about the area.

Collectively, we have 35 years of professional experience in forestry, fisheries biology, geology and geomorphology in the Elk and Sixes country. We have worked on this land, lived on it and studied it. All of us feel that the entire Dry Creek drainage and the tributaries of Elk River in the Planning Unit except Butler Creek should be maintained in a natural state--as wildlife habitat, as a benchmark or reference point against which to measure the impacts of management activities on surrounding lands, and, most important, as a natural area preserved simply because undisturbed ecosystems are fast becoming extremely rare and their unique aesthetic, wildlife, research and recreational values are increasing dramatically.

However, if the Forest Service plans to attempt to carry out the Proposed Action of logging much of the area, we feel that it is absolutely necessary that the action be delayed 10 to 15 years so that the impacts of the proposed new logging and roading methods can be tested outside the roadless area. This 10 to 15 year period is needed to assess 1) regeneration success, 2) ability of new types of roads to stand up during the normal course of maintenance and neglect, 3) stability of soils in clearcuts after the root strength binding the soil has been lost by rotting of root systems of killed trees, 4) response of these sites to major, infrequent storms. Because of these and other long-term factors, the success of new methods applied in the difficult terrain typical of the Planning Unit cannot be evaluated by looking at a cutting unit or section of road only 1 or 2 or even 5 years old. The new methods of tree lining, fully benching roads, end hauling and piling of waste material, cutting very high backslopes and logging with helicopter and skyline systems over long distances are all in experimental stages and have not been tested under the especially difficult conditions in the Planning Unit. Granted, these new methods may overcome some of the old problems, but they are all unproven, expensive, highly energy consumptive and they are introducing new environmental and technical problems that are just beginning to be recognized.

Based on our extensive backgrounds in forestry, fisheries biology and geology in the area, we do not believe that with present knowledge the Proposed Action can be successfully carried out under the restrictions and assumptions which the Siskiyou National Forest has set for itself. Fisheries, soil, wildlife and other nontimber resources are not adequately protected under the Proposed Action.

Respectfully submitted,

Reese Bander

Reese Bander
Fisheries Biologist
Elk River Salmon Hatchery

Paul Reimers

Paul Reimers
Fisheries Biologist
Elk River Salmon Hatchery

A. Jane Rogers

Jim Rogers
Forester, Timber
Manager
formerly with Western
States Mill
Elk River

George Shook

George Shook
Forester
formerly with Western
States Mill
Elk River

Fred Swanson

Fred Swanson
Geologist
University of Oregon
Eugene

cc: T. A. Schlaffer, Regional Forester
R. W. Phillips, U.S.F.S., Regional Office

Senator Robert Packwood
Senator Mark O. Hatfield
Representative Jim Weaver
Governor Robert Straub
Curry County Reporter

Port Orford News
Coos Bay World
Oregon Environmental Council

Letter No. 86



Department of
Fisheries and Wildlife

Corvallis, Oregon 97331 (503) 754-1531

May 23, 1975

Mr. William P. Ronayne, Supervisor
Siskiyou National Forest
P.O. Box 440
Grants Pass, OR 97526

Dear Mr. Ronayne:

I have reviewed the draft environmental statement on the Land Use Plan for the Mt. Butler-Dry Creek Planning Unit. You are to be congratulated on a thorough study, which appears to consider most of the important values in the area. However, I feel the need to comment on some of the recommendations.

My familiarity with the area goes back to 1964, when I began supervision of the research project of Dr. Paul Reimers. As he began to develop information on the status of the fall chinook salmon populations in the area I became convinced that the Sixes and Elk Rivers were a unique natural resource for the state of Oregon. I believe this area should receive very special treatment in the process of land management.

On balance I feel the analysis is well done. The potential adverse impacts are not played down. However, when it comes to the decision of an alternative, I am not sure that the choice matches the analysis.

I have been particularly unimpressed by the logging operations I have seen in the Elk River drainage, particularly in Butler Creek. I realize that much of the damage occurred from operations carried on some time ago. However, I believe that until you have concrete evidence that modified techniques can harvest timber in that unstable country without damage, no large scale plan should be approved. In short I suggest that nothing significant would be lost if the entire planning unit were kept in its present state for 10 years, while additional information is being developed. I am in favor of an alternative that maximizes the preservation of future options. The area can always be developed at a later time, but if future research defines a strong need for intermingled areas of unmanaged forest as a measure of diversity, it will never be possible to go the other way.

I have served as a member of the committee studying Research Natural Area needs in the Pacific Northwest. I expect you have seen a copy of the draft report from this group. The final report should be published soon. The very real benefits to be gained from this program could be destroyed by premature action. Either Dry Creek or Anvil Creek represent potential Research Natural Areas of considerable promise, based on the considerable backlog of data available on them. The proposed action would close that option. No consideration for this need was included in the deliberations.

Life	✓
Admin	✓
Supv.	✓
T. M.	✓
A. G.	✓
Leads	✓
Engr.	✓
Fire	✓
Wild	✓
Washed	✓
SISKIYOU	✓
MAY 27 1975	
B & F	✓
Person	✓
Reserve	✓
AC. 1975	✓
Comm.	✓
Plan.	✓
Zone I	✓
Zone II	✓

2/1/75
J. P. H. / J. P. H.

Mr. William P. Ronayne

2

May 23, 1975

Although it is acknowledged that road construction is the major cause of mass soil failure and debris avalanches, recent information suggests that timber harvest alone may cause significant problems in areas of steep unstable terrain. Dr. Swanson at the Forestry Sciences Lab in Corvallis is just beginning a research study on the importance of root decay as a factor in causing mass failure. Here again, little will be lost, and much could be gained by foregoing action on this area until further information is available. Looking back over the progress that has been made in the past ten years in better understanding of physical processes and in harvesting technology makes one even more convinced of the desirability of delay. This is especially so in the case of an area with so many acknowledged management problems and critical areas as this planning unit.

The Anvil Creek watershed is a case in point. The damage that could be done to the chinook resource in general, and the Elk River Hatchery in specific, by a mass failure and debris avalanche in the Anvil Creek watershed is inestimable. Yet there is very little assurance that the 1/8 mile buffer on Anvil Creek will prevent such an occurrence. The same is true to a lesser degree on Dry Creek. Buffer strips are no protection against mass movement. Dr. Fred Swanson's studies of mass movement in the Elk River drainage provide significant cause for concern about this critical situation.

The alternative chosen is promoted as a "balanced mix". From the table of timber harvest volume, one might dispute that. If the entire Siskiyou Forest were to be managed with the obvious care given to this management unit, I would not be so concerned. This is unquestionably a greatly improved plan over the type of management that has been carried out in the past. However, since it applies to such a small fraction of the total forest that has not been accessed by road construction, it is essential that extreme care be exercised.

I believe that something much closer to Alternative 2, with the addition of complete protection for Anvil Creek as well as Dry Creek, is appropriate for the long-term future and the preservation of future options.

Sincerely,

James D. Hall

Associate Professor of Fisheries
Coordinator, Alsea Watershed Study

ds

Letter No. 87

Geology Department
University of Oregon
Eugene, Oregon 97403
May 23, 1975

Mr. W. P. Ronayne, Forest Supervisor
Siskiyou National Forest
P.O. Box 440
Grants Pass, OR 97526

Dear Mr. Ronayne:

I am writing to comment on the Draft Environmental Impact Statement for the Mt. Butler-Dry Creek Planning Unit. The unit is part of an area that I have been involved with almost continuously since 1966, including a period of work under contract to the U.S. Geological Survey to map and analyze patterns of geology, land use, erosion processes and spawning habitat throughout the drainages of the Elk and Sixes Rivers. The following comments can only scratch the surface of my deep, long-held concern for the area.

To begin with, this impact statement is clearly the best of the half a dozen or so statements that I have read. Considering the very limited amounts of time and resources available, your planning staff has done a really outstanding job of collecting and describing the environmental data used to characterize the area. However, the management action proposed in the statement does not follow logically or reasonably from the environmental information presented. The Proposed Action appears to be a political decision made without regard for long-term environmental and human values or even the impact analysis outlined in the statement.

If the Forest Service tries to carry out the Proposed Action, it will be contrary to the public interest and against the clear public opinion expressed at public meeting in Coos Bay and Fort Orford and in the written responses summarized in Appendix F of the statement. Nontimber resource specialists, in particular, fisheries biologists of the Oregon Wildlife Commission, Oregon Fish Commission, Bureau of Land Management and private organizations, have also argued vigorously for protection of the area by barring logging in all areas outside Butler Creek drainage. It is the duty of Forest Service administrators, as managers of the public's lands, to heed the public's wishes.

Management of the Planning Unit which would result in the greatest public benefit would be to allow all of Dry Creek and the tributaries of Elk River below Butler Creek to function as natural ecosystems. Section 36 and the road into it should be allowed to recover and Butler Creek basin could be managed for timber, but with improved fisheries protection along the streamside corridor. Such a management program would best protect and maintain the most important values of the roadless

areas within the unit. These values are 1) to function as an extremely productive area for spawning and rearing by salmonids, 2) to ameliorate or buffer the deteriorated water quality conditions in much of the rest of the Elk and Sixes Rivers and 3) to serve the many vital, but poorly recognized, purposes of preserved, undisturbed ecosystems.

The statement places a \$440,000 value on 1) and shows some consideration of 2) in so far as the \$800,000+ Elk River Hatchery is concerned. The relative values of 1) and 2) will continue to increase greatly with the continued exploitation of timber resources in all surrounding, nonagricultural areas of the Elk and Sixes drainages. The value of 3) receives virtually no consideration in the statement.

There are many educational, research, wildlife, aesthetic and recreational reasons for preserving large, undisturbed tracts of natural ecosystem. Such areas are rapidly being eradicated. Soon this roadless area will be the only sizeable piece of land within hundreds of square miles which is not committed to timber management or other form of intensive exploitation. Millions of surrounding acres of land under Forest Service, B.L.M., state and private control are being managed exclusively for timber. The Forest Service has an important stake in preserving natural areas to serve as geomorphic benchmarks against which to measure the impacts of management practices. We have essentially no baseline data on natural erosion rates in coastal southwestern Oregon. Without undisturbed reference areas it is impossible to determine the extent to which soil erosion is accelerated by logging and roading. It is therefore impossible to determine if we are practicing sustained yield management of trees and, it follows, the nutrient capital of tree growing sites.

A key Forest Service argument for the Proposed Action is that new methods of logging and road construction will be used to minimize the types of unacceptable environmental impacts which have occurred in this terrain in the past (lower Butler unit, Purple Mountain Creek, etc.). However, there is absolutely no reason to believe that these new methods will be economically and technically feasible or environmentally beneficial. Consequently, I have three major reservations about the Proposed Action:

- 1) It is not economically and technically feasible to execute the action in the fashion loosely outlined in the statement.
- 2) The economic and technical hangups with the Proposed Action may result in the area being "managed" with methods having much greater adverse impacts than the impacts acknowledged in the statement.
- 3) Even if the action could be executed as stated, it would still not offer adequate consideration and protection for fish, wildlife and other nontimber resources.

Addressing each of these concerns in order:

- 1) Each of the proposed new methods of uphill felling, constructing fully benched roads by cutting high backslopes and end hauling, and

logging with skyline and helicopter over long distances is extremely expensive both in terms of capital and operating costs. This will mean heavy resistance from timber purchasers and low \$ return to the public. For example, helicopter logging is very expensive and involves very high rates of fuel consumption/Wbf harvested. I cannot believe that in 10 years we will be using our dwindling petroleum resources to fly trees out of the woods. Furthermore, the capabilities of the new methods have not been tested and proven in the type of country in the Planning Unit. Some of the new methods may help out with some of the old problems of fill failures and soil surface disturbance, but they are also creating a new set of environmental and technical problems that are just beginning to be recognized.

A few examples:

- a. There are few places to pile waste, end-haul material in that steep country, so there will be long, costly hauls and high probability of improper spoil placement which can result in massive slides and reactivation of old slumps.
- b. The high backslopes of fully benched roads will be cut into rocks which are broken by numerous joint surfaces and small faults where rock falls can be initiated both during and after road construction. This is a predictable problem with high cut slopes and it is a problem that has already taken the life of one heavy equipment operator in that country and has resulted in several other close calls recently. Since this problem is now being recognized, the liability of the Forest Service for negligence in case of death, injury and destruction of property is greatly increased. Construction of a fully benched, high backslope road system through the Planning Unit could well cost \$100,000's in legal settlements for accidents due to backslope failures.
- c. The proposed road system shown in the statement leaves large areas more than 1/2 mile from a landing and some areas more than 1 mile away. I cannot see how it will be economically and technically possible to log over long distances in country where it is extremely difficult to get good tailholds, maintain wide buffer strips and still have cutting units of small to moderate sizes.
- 2) The Forest Service justifies the Proposed Action with the idealistic assumption that new methods will prevent old problems. However, there are many reasons to doubt that this will be true. What are the contingency plans for areas where minimum impact logging and roading methods cannot be used? Will areas where helicopter logging is planned be managed in the undisturbed state if helicopters cannot be used? What assurances are there that the area won't be opened up with promises of careful management, but that in 10 years we will see standard and unacceptable practices being used with the excuses of economic and technical constraints? These types of questions should be specifically addressed in the statement.
- 3) In addition to the destruction of the many values of preserved ecosystems, the Proposed Action would have unacceptable impacts on

Letter No. 88

[illegible]

William P. Ronayne, Forest Supervisor
Siskiyou National Forest
P.O. Box 440
Grants Pass, Ore. 97526

As a concerned citizen of Curry County, I feel obligated to voice my opinion regarding possible logging of the Mt. Butler-Dry Creek Planning Unit. After reading the Draft Environmental Statement, I can only come to the conclusion that it would be a disastrous mistake. Aside from the fact that it is the last roadless area on Curry's coast (which in itself should be enough), there will be entirely too many hazards involved.

Not only will the fisheries industry be adversely affected; but also the ranchers as water levels will be lower in summer and higher during flooding. Ruining fields by winter and lending itself to difficulty irrigating during the dry season. A $\frac{1}{2}$ mile buffer strip will be fine for the first five years but what after that? Say in ten years--after a few good storms, how many of those trees will remain standing? Not enough to do the job of an entire forest. I'm afraid.

Wildlife will be upset. Especially the threatened Northern Spotted Owl who will not seek a new habitat but die with its home.

Please leave our wilderness alone. The land has been raped enough. I would like to know why anything has to be done with the Planning Unit. I have not received a satisfactory to this question. Must every square

There will be a great variety of impacts from the Proposed Action. A few examples:

- a. Buffer strips are likely to suffer heavy blowdown in this coastal area of high winds, thus leaving streamside areas unprotected.
- b. Debris avalanches trigger high on logged and roaded slopes will cut down through the buffer strips, thereby setting up debris jams which may block fish movement and otherwise disrupt the fish habitat.
- c. Much of the habitat for old-growth adapted wildlife will be eliminated and those areas that are proposed for preservation appear to have been selected on the basis of other considerations (timber productivity, streamside protection, etc.) rather than in terms of maintaining the best old-growth habitat.

In light of these and many other considerations I feel that at the very least there should be a 10 to 20 year delay before any logging and roading is permitted in the area. This period of time is needed to evaluate the success of regeneration and the ability of new methods to minimize soil erosion and other negative environmental impacts.

Swan

cc: T. A. Schlapfer, Regional Forester
Representative Jim Weaver
Oregon Environmental Council

Research Associate in Forest Geomorphology

title of this land be under "control"?

I also strongly urge you to hold another meeting in Port Orford regarding the Planning Unit. Few were amply notified of your 5/21/75 meeting and many hadn't the opportunity to read the Draft Environmental Statement. The people of this community deserve the right to speak with you and express their opinions.

Sincerely,

Shirley B. Alsop

Letter No. 89

MAILED	27 1975	RECEIVED
FEDERAL BUREAU OF INVESTIGATION		
U.S. DEPARTMENT OF JUSTICE		

People of the United States Forest Service. I have a lot of conflicting feelings about this letter. I still have a reasonable amount of trust in government agencies but that trust is dwindling fast.

I am very familiar with the Mt. Butler Dry-Creek drainage. I have spent many weeks hiking and camping in this area. I have studied the trees, animals, flowers, mushrooms and many other things of love that appear abundant in their finest form. I wondered how all this beauty came to be, and the only conclusion was lots and lots of time.

The Mt. Butler Dry Creek drainage is very steep Rocky Mountain type country. The majority of the trees have simply grown out of the cracks and crevices in the rocks. I don't think the Forest Service has a plan that can replant this type of terrain. Since the trees are removed, what little soil there is will slide into the creeks and streams. The soil erodes with it all the seeds spores insect eggs etc. so even if somehow the trees were replanted it would be a forest without a floor. The damage only begins with erosion. The animals die because of less food. Insects and birds are left with out homes. Any ranches or farms in the immediate become over run with pest that didn't use to be pest.

I could go on listing all the undesirable changes but I feel you already know them. It will be interesting to see just who's running the U.S. Forest Service, the people or the Lumber Companies. Sincerely yours, Floyd A. Williams
P.O. Box 2477 Sixes Oregon 97146

Letter No. 90

PROFESSIONAL ENGINEER

Letter No. 91

PROFESSIONAL FORESTER

Ronald E. Stuntzner

1260 GOLDEN COOS BAY, OREGON 97420 TELEPHONE 267-2872

May 30, 1975

Mr. William P. Ronayne
Siskiyou National Forest
Grants Pass, Oregon 97526

Dear Mr. Ronayne:

This letter is concerning the Mt. Butler - Dry Creek Planning Unit.

As a land surveyor and forester I have had several opportunities in the last several years to enter the area under study. By giving consideration to my personal experience in this area, the Forest Service workshop I attended and my background as a professional forester I have concluded that Alternative 4 as outlined in your brochure to be the most satisfactory approach to the Unit. Some of the reasons I feel this way are as follows:

1. Dr. Hank Froehlich, soil scientist at OSU, tells me that it is possible to accurately predict stream temperatures as affected by logging and that proper planning of the logging layout can assure temperatures needed by fish. I think it is possible to maintain a high quality fishery program along with a healthy forest economy for Southwest Oregon.
2. Economic studies made by the Forest Service show the economic benefits to far out weigh the benefits of preservation. In this day of diminishing natural resources, the United States needs high productivity from its renewable resources such as

Letter	✓
Action	✓
Dist. 0	✓
Supv.	✓
T. M.	✓
A. O.	✓
Lands	✓
Engr.	✓
Fire	✓
Wildlife	✓
Wished	✓
SISKIYOU	
MAY 30 1975	
B & F	
Person	
Reserve	
Ad. Serv.	
Cont. E.	
Per. M.	
Zone I	
Zone II	

pk/est
ml

May 24, 1975

POINTER'S TRAILER COURT
3.8 MILES UP SOUTH BANK ROGUE ROAD
FROM GOLD BEACH

RT. 1, BOX 25, GOLD BEACH, OREGON 97444
247-7492
LP GAS BOTTLES FILLED
RENTAL TRAILERS
CARL E. & LOIS FREDERICKSON

Gentlemen:
We're writing to you, to inform you of our feelings about the Dry Creek Study Area & Region. Siskiyou Planning Unit.
We want them written to the area's Timber program. Our population is sparse here; I feel we can't afford to lose the timber and carry our load of taxes. Sincerely, Carl & Lois

FORREST J. HALES

FORESTER SURVEYOR

1490 N. IVY • TELEPHONE 396-2596

COQUILLE, OREGON

97423

June 2, 1975

Mr. Wm. P. Ranayne
Forest Supervisor
Siskiyou National Forest

Dear Mr. Ranayne:

I am writing to you in regard to the proposed Dry Creek Roadless area. I spent three months in that area in the fall of 1969. We surveyed the area for the proposed Grassy Knob to Mt. Butler road, the road that hasn't been built. As you are probably aware, the road was to run on or near the ridge top from Grassy Knob to the west side of Mt. Butler. On the Dry Creek slope we found some of the finest Douglas Fir timber I have ever seen and I have been working in Oregon timber since 1946. This is prime timber land and should not be set aside because of the actions of a vocal pressure group. It would be better to relocate the fish hatchery than to restrict logging in this area.

I feel that the Forest Service is being negligent in the management of our National Forest land when you people who have had four or more years of college training in forest land management take your directions from a very small minority of the population, a minority with little or no forestry training.

I want you to put me on record as being unalterably opposed to any unusual logging restrictions for the Mt. Butler - Dry Creek area.

Sincerely,

Forrest J. Hales
Forrest J. Hales

Area	Acres	Surveyed	Map	Notes
Grassy Knob	100	✓	✓	✓
Dry Creek	100	✓	✓	✓
Mt. Butler	100	✓	✓	✓
Area	Acres	Surveyed	Map	Notes
Grassy Knob	100	✓	✓	✓
Dry Creek	100	✓	✓	✓
Mt. Butler	100	✓	✓	✓
Area	Acres	Surveyed	Map	Notes
Grassy Knob	100	✓	✓	✓
Dry Creek	100	✓	✓	✓
Mt. Butler	100	✓	✓	✓

JUN 5 1975

Forrest J. Hales

100-411/101

timber. Likewise, the United States does not need its timber growing stocks reduced by preservation. The value of the timber as lumber, plywood and fiber in this Unit is unquestionably high; future rotations may prove to be of equal or higher value.

3. In the last ten years I have been in the "woods" nearly every working day and I would estimate that I have seen no more than a half dozen hikers. How can the benefits received by a handful of hikers outweigh the need of the thousands of Americans that desperately need housing?

Thank you.

Sincerely yours,

Ronald E. Stuntzner
Ronald E. Stuntzner

HOWARD E. JONES
CHRIS STROMSNESS

Letter No. 93

JONES AND STROMSNESS
ATTORNEYS AT LAW
2632 DUNSMUIR AVENUE
DUNSMUIR, CALIFORNIA 96025

June 3, 1975

Siskiyou National Forest
P.O. Box 440
Grants Pass, Oregon
97526

Re: Mt. Butler - Dry Creek Roadless Area

Please send me a copy of the draft EIS on this unit.

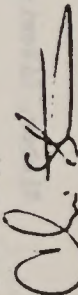
Pending receipt of the copy, and because I don't know what your comment deadlines are, I must give you a few of my basic feelings on this area.

Logging, if allowed at all, should be severely restricted on the watersheds of the Elk and Sixes Rivers. Right now, these two rivers offer one of the surest chances for steelhead on the Oregon Coast in the winter. Bad weather can muddy most coastal rivers very quickly. The Elk is slower to muddy, and therefore is a must river to try for fishermen who have travelled any distance. This January, it produced a sixteen pounder for me under conditions where other streams were all unfishable.

On the other hand, a long dry spell in winter can make most rivers crystal clear and low, again making fishing difficult. The Sixes river is slower to clear than most of its neighbors, so it is important to the sportfishing industry also. This February, I hooked and lost a nice steelhead there when the other streams were all too low and clear.

Normal logging of the watersheds of these two streams would harm the fishery by silting-in spawning beds, raising water temperatures, and increasing winter turbidity. The Sixes is already very turbid. The clarity of the Elk is unusual and should be preserved. I urge you to adopt a management plan treating these watersheds as wilderness or at least extending very tight controls on any logging allowed.

Sincerely,



CHRIS STROMSNESS
Attorney at Law

CS/s

PHONE 235-4881
P. O. Box 567

John	
Arthur	
Barbara	
Bob	
Carl	
Edith	
Frank	
Grace	
Harold	
Irma	
Jack	
John	
Lucas	
Martha	
Paul	
Ruth	
Samuel	
Tina	
Walter	
William	
Yvonne	
Zoe	

SISKIYOU
JUN 4 1975

B & F
Postal
Basice
lv. 2
Ph. 12
Juni 1
Juni 11

Hyatt

Letter No. 94

LOUIS PRAHAR
FOREST ENGINEER
OREGON REGISTERED LAND SURVEYOR NO. 506
R. R. 1, BOX 680
CAMSON, OREGON 97411

June 10, 1975

Mr. John Millet, Forest Planning Leader
Siskiyou National Forest
Grants Pass, Oregon

Dear John:

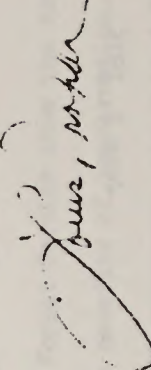
Reference: MT. Butler-Dry Creek Planning Unit

I am a Graduate Forester and a former U.S. Forest Service district ranger who believes in the multiple use concept for the management of all of our national forest lands.

I am familiar with said MT. Butler-Dry Creek area and its valuable timber resources as well as its recreational value. We can have both uses in this area with proper management. I hope that the Forest Service is not compelled to "bottle up" this area as proposed by the Sierra Club and other pseudo-experts. These people believe in a single use concept for this area, namely, recreation, and thereby prevent the utilization of the many fine stands of old growth Douglas fir located in parts of the said area. I do agree that the steep areas on the Elk River drainage near the fish hatchery which contain very little merchantable timber, should not be clear cut, but the concept that all logging in the said "Unit" will affect the temperature and the future of the hatchery is basically false.

In summary, I want the Forest Service to manage this "Unit" for all uses including logging, timber production, recreation, and watershed protection.

Very truly yours,



Letter No. 95

June 13, 1975

Forest Supervisor
Siskiyou National Forest
P.O. Box 440
Grants Pass, Oregon 97526

Dear Sir:

I support your proposed action regarding management of the Mt. Butler-Dry Creek planning unit. It seems to me that this is a balanced program of uses for the area and should satisfy most public demands.

I question the comparison of fisheries values and timber values. It seems to me that not all the economic impact of the timber resource has been considered, but even under the measuring system used, it is pretty important to the coastal area.

I also question whether steelhead fishermen average a net economic benefit of \$20.00 per day as stated on page 16. I believe they generate some such amount in the area, but all they get is the happy experience.

Thank you for the opportunity to participate in your decision process.

Sincerely,

Dee Hustead
Dee Hustead

1222 Cedar Flats Road
Springfield, Oregon 97477

Info	X
Action	X
Distrib. D	X
Supv.	
T. M.	
A. O.	
Lands	
Engr.	
Fire	
Wildlife	
SISKIYOU	
JUN 20 1975	
B & F	
Person	
Reserv	
Ad. Serv	
Contig	
Purch	
Zone I	
Zone II	

Letter No. 96

Box 3A, Cape Blanco Route
Sixes, Oregon 97476

June 14, 1975

Mr. W. P. Ronayne, Forest Supervisor
Siskiyou National Forest
P. O. Box 440
Grants Pass, Oregon 97526

Dear Mr. Ronayne:

When your own Environmental Impact Statement and the collective expertise of such people as Dr. Fred J. Swanson, Geologist, Dr. Paul E. Reimers, Fisheries Biologist, Reese E. Bender, Fisheries Biologist, John W. Anderson, Chairman of the Stream Habitat Committee of the Can Fisheries Society, Dr. James D. Hall, Associate Professor of Fisheries at Oregon State, A. James Rogers, Forester and Timber Manager, and George R. Shook, Forester, all point to the extreme hazards of logging Mt. Butler-Dry Creek, and those experts in Geology, Marine Biology and Forestry have recommended leaving the area alone for 10-20 years, and yet your office comes out in favor of substantial logging (Alternative 3), one can only surmise that a grave mistake has been made.

We have had our Vietnams and our Watergates because people in decision-making capacities have not been able to admit when they were wrong and rectify it before disaster proved them wrong. Human beings are fallible. Agencies and bureaucracies within all levels of Government are fallible. When a mistake has been made, as is obviously the case in your plan to log Mt. Butler-Dry Creek area (Alternative 3), you have the opportunity and the responsibility to admit it and correct it before untold damage is done to human lives, the environment, fish and wildlife, the Elk River Fish Hatchery, the ranchers on the Elk and Sixes Rivers, and the general public in whose interest you have been entrusted to make wise use of our natural resources.

I urge you to follow the course compatible with your own E.I.S. and judged by experts to be the right one--to wait 10-20 years before deciding on Mt. Butler-Dry Creek roadless area. When Government agencies are truly responsive to educated public input, when they will admit occasional error and correct it, they do more to strengthen and insure their stature and credibility than anything else: you can make the system work.

Please don't let the public, the environment and the Forest Service down. I look forward to seeing your final decision.

Yours sincerely,

Robert B. Shook

Robert B. Shook

cc: T. A. Schlapfer, Reg. Forester Governor Robert Straub
R. W. Phillips, U.S.F.S. Reg. Off. Curry Co. Reporter
Senator Robert Packwood Port Orford News
Senator Mark O. Hatfield Coos Bay World
Representative Jim Weaver Oregon Environmental Council

Letter No. 97

Rt. 1, Box 85 B
Brookings, Oregon 97415
June 16, 1975

William P. Ronayne, Forest Supervisor
Forest Service, U.S.D.A.
Siskiyou National Forest
P.O. Box 440
Grants Pass, Oregon 97526

Dear Sir:

I am very much involved in your environmental impact statement concerning the Mt. Butler-Dry Creek Planning Unit. My job as Logging Supervisor for Hank and Chopper Westbrook has placed me in direct daily contact with the area for the past two years. During this period, we have constructed a ridge top road system and have logged with both tractor and Hi-lead (skyline system) in an area that covers several square miles of private ownership in the Northwest portion of this planning unit. Nothing disastrous to the environment has occurred as a result of our timber harvesting. All areas logged have been replanted with a new crop of seedling trees (no slash burning required). The survival rate on young trees is over 85%, indicating the land use to be very good for timber as a crop.

My personal observation has been no noticable decline in any species of fish or wildlife in our working area. I have, however, seen an increase in the following: deer, bear, bob-cat, coyote, quail, grouse and pigeon, also four elk have entered the area.

I am in full support of your choice of Alternate Plan No. 3 for future management of this Mt. Butler-Dry Creek area. By using the services of the qualified people that you have available in each of your departments, I am sure that every phase of development needed to provide for a sustained yield of 5.4 million bd. ft. of timber annually from this acreage could be carried out with no problems. The planned buffer strips along the streams will be more than adequate to protect the fisheries and give people a good recreation area that may be enjoyed by all.

Here in Southwestern Oregon, we need to keep all the industry going that we possibly can, in addition to providing a recreation area for ourselves and our neighbors from afar. I believe that Alternate Plan No. 3 is a good sound one that fits our needs for the future. It will provide jobs, wildlife, dollar flow, and recreation from our re-newable natural resources.

Sincerely yours,
Robert E. Brown
Robert E. Brown

TIMBER

Letter No. 98

FARMING

RESERVATION RANCH

Post Office Box 1094
Coos Bay, Oregon 97420
Office Phone (503) 269-5808



June 16, 1975

Siskiyou National Forest
P.O. Box 440
Grants Pass, Oregon 97526

SUBJECT: Mt. Butler-Dry Creek Draft Environmental Statement

Attention: William P. Ronayne

Dear Bill:

I wish to support Alternative Plan Number 3.

Plan No. 3 would do the most good for the most people. Plan No. 3 appears to be geared toward the protection of the Fisheries, Wild Life, Recreation, and the Economy of the South Coast Area.

With new machines being built with greater capabilities and mobility, the area should be able to be logged with very little impact to the ground cover.

There is good deflection for skyline systems in much of the area. With good layout of the cutting units and main roads location, many of the secondary roads needed in ground systems, could be eliminated with skyline systems, thus reducing the soil erosion problems by eliminating the possibility of slumps and slides and less open ground.

There already is an existing all weather road which extends to within a few hundred feet of the south end of Section 15. This same road branches out through Section 16, 17 and 18. This already existing system would put the Forest Service in position to put

Info	1	
Action	1	
Distrib.	1	
Supv.	1	
T. M.	1	
A. O.	1	
Leads	1	
Eng.	1	
Fire	1	
Washed	1	
SISKIYOU		
JUN 17 1975		
B & F		
Person		
Recre		
Ad. Serv.		
Contg		
Purchg		
Zone		
Zone II		

Info	1	
Action	1	
Distrib.	1	
Supv.	1	
T. M.	1	
A. O.	1	
Leads	1	
Eng.	1	
Fire	1	
Washed	1	
SISKIYOU		
JUN 17 1975		
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Person		
Recre		
Ad. Serv.		
Contg		
Purchg		
Zone		
Zone II		

296-481/484
m/17 end

Mr. Roynane
June 16, 1975
Page 2

timber sales into Section 20, 21 and 22 with very little impact since they would be on top of the ridges.

With better utilization of wood products within a logging unit there should be very little slash burning necessary on steep burned areas.

At the present time I fill the position of Company Forester for Reservation Ranch, with the larger amount of my time being spent to Reforest the cut over lands the company is acquiring and the new cut over logging areas.

Sincerely,

George A. Arvidson

George Arvidson

Letter No. 99

Mr. William P. Roynane
Forest Supervisor

William P. Roynane
Box 135
Broadhead Ave

Dear Sir

I would like to say here, some of the things that have been in my mind for several years; I have been in the woods every year since 1929, so I feel I have some knowledge of what I am going to say.

Much of our forests have timber long over-ripe, These trees have died and dying tops, broken tops and cork rot, a large percent are badly stump rotten, not always visible to those who do not work with these trees, These trees blow down, or break off during winter storms. This timber is already past harvest time, much of this in our wilderness areas,

When this timber is harvested and replanted is new young trees, we soon have a new growing forest that benefits mankind, and wildlife alike.

2

A well managed area is also a

protected area, because of access roads.

It is hard to control forest fires that are hard to get to. I have helped fight several, lightning fires are no respectors of Primitive Areas.

Now, I also enjoy Primitive area, But I have to face the facts, saying aside large Primitive areas is unfair to the largest percent of our people.

We all have a large interest in our forests. But many of us have had to work the biggest part of our life.

Now we would like to see some of this wild wonderful country, But our senior citizens, and many younger people some crippled, some with heart conditions, can no longer put a pack on our back, and like the tough trails, We feel we also have a right to see and enjoy these places.

Proper handling of these places, would put in access roads, help to protect these areas.

3

and allow some of us older folks, to also see, and enjoy these areas

In all fairness to those, who want large wild areas set aside,

What percent of those people really use these areas. To me it is discriminating against a great many people for a few.

I, and my wife would also like to see these places. But we can no longer handle the bike

access roads would at least let us see from a reasonable distance,

It takes only few years, for a replanted forest to become, a wilderness.

I say, let us harvest our timber resources, and plant new vigorous stands, so they are harvested

Yours sincerely
Ralph P. Gibbs

Please excuse, improper spelling
poor writing + etc.

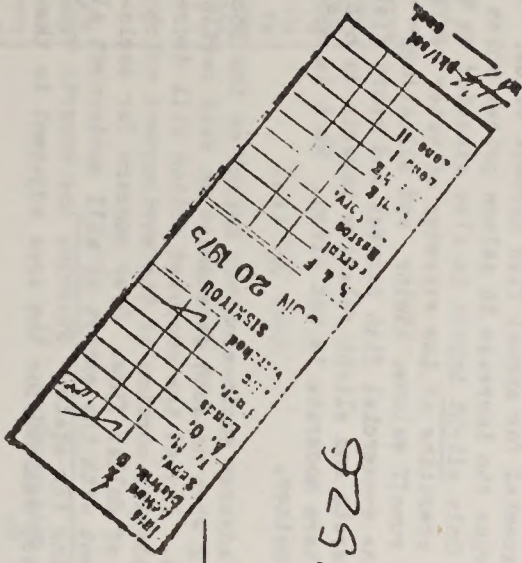
I only got to the 8th grade.

But this comes from the heart,

Thank you

Letter No. 100

88 HILLCREST DR,
NORTH BEND, OR 97455



Mr. W.P. Ronayne
Forest Supervisor
SISKIYOU NATIONAL FOREST
P.O. BOX 440
GRANTS PASS, OREGON 97526

DEAR SIR:

AFTER STUDYING CAREFULLY THE
MY BUTLER - DRY CREEK DRAFT ENVIRONMENTAL
STATEMENT - I WOULD LIKE TO REQUEST THAT
THE PROPOSED ACTION BE MODIFIED IN THE DIRECTION
OF ALTERNATIVE 1 OR 2, HAVING MADE SEVERAL
RECENT VISITS TO THE DRY CREEK AREA
I FEEL THAT THIS BEAUTIFUL REGION DESERVES
THE MAXIMUM AMOUNT OF PROTECTION POSSIBLE.
THE FRAGILE SOIL OF THE AREA & THE ROCK
MULCH SITUATION WOULD SEEM TO MAKE THIS
AREA MORE SUITED TO PRESERVATION. THE
NARROW CORRIDOR IN THE PROPOSED ACTION IS NOT
SUFFICIENT. THE ENTIRE DRAINAGE SHOULD BE
PROTECTED.

Sincerely
Will Wirt
Will Wirt

Letter No. 101

1025 West Park Roadway
Coos Bay, Oregon 97420
June 23, 1975

Mr. William P. Ronayne
Forest Supervisor
Siskiyou National Forest
P. O. Box 440
Grants Pass, Oregon 97526

Dear Mr. Ronayne:

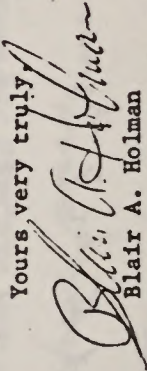
Re: U.S.D.A. Draft Environmental Statement on Land Use
Plan for the Mt. Butler-Dry Creek Planning Unit

I am in agreement with the U.S. Forest Service's decision to accept Alternative 3 as the best plan for the Mt. Butler-Dry Creek Planning Unit. This Proposed Action seems to provide the most acceptable method of providing equal economic and social values for the unit and the surrounding communities.

I am not in agreement with the Forest Service's decision to include large areas of private ownership within the planning unit. I believe the boundary lines, especially on the North side of the unit, could be withdrawn to eliminate the need to acquire private land holdings. Acquisition of private land holdings remove land from the local tax rolls and provides no incentive for local property owners to effectively manage their lands.

Finally, I believe the Forest Service should make a better effort to distribute copies of the Draft Environmental Statement. More publicity should be given to the availability of this document and methods needed to acquire the Draft Statement.

Thank you for allowing me to present my thoughts.

Yours very truly,

Blair A. Holman
Professional Forester

Info	✓
Action	✓
Dissem.	✓
Supv.	✓
T. M.	✓
A. G.	✓
Land	✓
Engr.	✓
Fire	✓
Wild	✓
Washed	✓
SISKIYOU	
JUN 25 1975	
G & F	
Perse	
Resce	
Ad. Serv.	
Cont'g	
Plat'g	
Zone	
Zone	

Letter No. 102

June 25, 1975

Mr. W. P. Ronayne
Forest Supervisor
Siskiyou National Forest
P. O. Box 440
Grants Pass, Oregon

Dear Mr. Ronayne:

Your people have done an admirable job in researching the Mt. Butler-Dry Creek area. Based on the presentation at SWOC, your Draft Environmental Statement and three personal visits to the area, I have no conscientious choice except alternative number 2.

My views are based on the current economic production of the Dry Creek area (especially considering the increase in salmon prices) and a knowledge of what logging will do to the watershed. Considering the paucity of unmarred watersheds left in the state, the assured productivity of this one if left alone, the availability of timber resources elsewhere, the continuing export of softwood logs, and the extreme lack of "unattacked" areas in the coastal range, I can see no legitimate reasoning compelling the Forest Service to risk destruction of the existing situation.

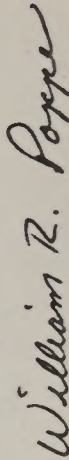
Concern for the fisheries resource is born out by the incongruities in the comparative data on pages 74 - 76 of your Draft Environmental Statement. Under proposed alternative 3 moderate impact is expected for accelerated soil loss, water quality, water runoff timing, and fisheries habitat. But somehow only slight relative impact is expected for annual fish harvest value. This can only be a half truth considering the increase in salmon prices which control their net dollar value. Only slight impact is also expected on the Elk River fish hatchery, already operating at the extremes of water temperature limits controlled by water runoff volume, timing, and siltation. Likewise only slight impact on the commercial fish harvest and sport fish harvest is anticipated. The moderate and slight relative impacts do not balance. The definition of the term moderate is not given. What is moderate to one party may be extreme to another.

You cannot logically claim adverse socio-economic impact on the local environment for proposal number 2 when no such dependence on said portion of the environment currently exists. Indeed the proposed action will decrease the socio-economic impact of the fisheries portion of the environment which currently exists to a considerable volume of dollar flow. Over concern for socio-economic factors is not consistent with the export of mill employment along with the softwood logs now leaving the state. Stopping log exports would have the positive socio-economic impact desired for the area adjacent to the Mt. Butler area.

Again, I urge the adoption of proposal number 2 for the best future usage of the Mt. Butler-Dry Creek planning unit.

Thank you for your attention in this matter.

Sincerely yours,


William R. Poppe

Letter No. 103

Randall & Carol Sutton
Post Office Box A
Port Orford, Oregon 96744
June 26, 1975

Mr. W.P. Ronayne
Siskiyou National Forest Supervisor

Dear Mr. Ronayne -

Having attended the public hearing at Port Orford grade school regarding the Mt. Butler-Dry Creek timber management proposal, and having been your guests on the recent field trip to the planning unit, and having hunted and fished in much of the planning unit, we wish to acquaint you with our feelings toward the proposed use of this area. Put quite bluntly, we feel that logging on those critical erosion-prone soils would be taking an insane risk with the fishing resources in our area, and the Elk River Hatchery operations in particular.

Two negative aspects of timber management in the unit became known to us on the field trip to the area.

1.) The presence of unrepai red slides in the unit. When asked why these had not been repaired, your representatives replied that an act of Congress would be necessary for such action, and that proceeds from timber sales could not be used for such repair. This borders on madness for a unit as erosion-prone as Mt. Butler-Dry Creek. Slides there could have devastating effects on the water quality in Elk River and in Dry Creek.

2.) The use of herbicidal sprays such as 2,4D and 2,4,5T to "knock back the brush". Use of such chlorinated hydrocarbon sprays on East Coast timber areas resulted in reductions in crab populations offshore, at only a few parts per million in streams feeding these estuaries. It would be very interesting to correlate crab populations here for the past ten years with dates of herbicidal spraying on timber lands bordering coastal rivers and streams.

We are in favor of LEAVING THE MT. BUTLER-DRY CREEK PLANNING UNIT IN ITS PRESENT STATE, PERMITTING NO FURTHER LOGGING OR DEVELOPMENT OF THE UNIT! If such a designation for the area cannot be obtained, we reluctantly support Alternative #2 IF THE FOLLOWING CONDITIONS CAN BE MET:

- 1.) Placement of the Rock Creek and Anvil Creek drainages in a Fisheries-wildlife zone designation.
- 2.) Deletion of the road system following Grassy Knob trail.
- 3.) All management constraints in the environmental statement are imposed in the Butler Creek drainage.

We support the opinions voiced by State Fisheries Director Tom Kruse, but feel that a plan for immediate slide repair and the cessation of all herbicidal spraying in the unit should be included.

Randall Sutton
Carol Sutton
Randall & Carol Sutton
Port Orford

Letter No. 104

Consulting Forester and Surveyor

WARREN D. HOOTMAN
ROUTE 3, BOX 241Y 211
COOS BAY, OREGON 97420
PHONE 267-6165

June 30, 1975

Forest Supervisor
Siskiyou National Forest
Grants Pass, Oregon

Att: Mr. Romain

Dear Mr. Romain:

It is my understanding that you have requested additional public response in regard to the Butler Mountain-Dry Creek Area Management Proposal.

It is my opinion that the general goals of management be expressed without making absolute commitments to specific boundaries, limits or uses.

The forest including all of its constituents, timber, insects, disease, game and other wild life and fire is a very dynamic ecological grouping which is never in a stable balanced condition even though most changes are not apparent on a day to day basis. Much of the interplay of forces, energy exchange, water retention, storage and run off, erosion, soil building, geologic action, etc. are not fully understood. These areas such as the Butler Mountain-Dry Creek drainage should be under continued active management with the addition of continuing monitoring of the effects of the management practices used.

It appears that changes not presently predictable on the ground, in our technological ability to harvest, manage and use the forest, as well as changing public needs and goals, would not be best served by any rigid management program imposed at this time.

Areas which are ecologically sensitive beyond current technological competence can be identified and management concepts worked out in pilot programs if necessary. Certainly the conversion from a punitive to a managed forest is in the public interest.

Thank you for your efforts in seeking a beneficial and workable solution.

Yours truly,

Warren D. Hootman
Warren D. Hootman

WDH/dh

Info	✓
Action	✓
Dispatch	✓
Supv.	✓
T. M.	✓
A. G.	✓
Leads	✓
Engr.	✓
Fire	✓
Wildlife	✓
Wired	✓
SISKIYOU	✓
JUL 1 1975	✓
G & F	✓
Personal	✓
Revised	✓
A. J. Hootman	✓
Coast	✓
Zone I	✓
Zone II	✓

44 pht/est

Info	✓
Action	✓
Dispatch	✓
Supv.	✓
T. M.	✓
A. G.	✓
Leads	✓
Engr.	✓
Fire	✓
Wildlife	✓
Wired	✓
SISKIYOU	✓
JUN 30 1975	✓
G & F	✓
Personal	✓
Revised	✓
A. J. Hootman	✓
Coast	✓
Zone I	✓
Zone II	✓

44 pht/est

Letter No. 105

July 1, 1975

W. P. Ronayne
Siskiyou National Forest
P.O. Box 440
Grants Pass, Oregon 97526

211 Genessee
Medford, Oregon 97501

Dear Mr. Ronayne:

Thanks for inviting me to go on your Elk River drainage field trip June 17. It well illustrated your premise that timber management activities should continue in that area and in the Mt. Butler-Dry Creek planning unit.

It was really impressive to see the plantations coming along so well. True, there are some problems with the early harvest areas, but even these are starting to heal. It's apparent you have learned some lessons from the early cutting, and are now harvesting timber and building roads with minimal impact on other resources.

It should be obvious to anyone willing to objectively analyze the situation that all of the Mt. Butler-Dry Creek area could be managed for timber production without damaging the fisheries resource. However, your management alternative providing extra protection for streams and the visual and recreation resources seems a reasonable compromise. It gives full recognition of the importance of these other resources, but also recognizes the importance of the timber resource not only to the coastal area, but to the state of Oregon and the nation.

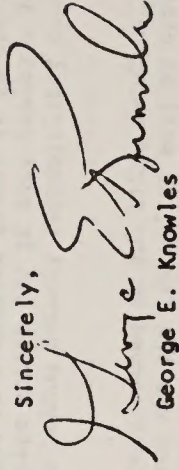
I recognize that any timber management program for the area must specify special procedures to make sure all resources are protected. These should include:

1. Road building - Roads need to be constructed so as to have minimal impact on the area. Dixie Creek and McCurdy Camp roads are good illustrations of this type of road.
2. Slash disposal - Fire control people must be convinced that burning alone is not the answer. Establishment of new forests and proper silvicultural treatment of these new forests are the important goals. With new fire techniques, a higher fire risk for comparatively short periods of time is acceptable.
3. Herbicides must be retained as a valuable silvicultural tool to hold back brush competition to young seedlings. The forest abounds with excellent examples of good results obtained from herbicide treatments.

4. A wide array of logging methods is available for use to make sure site damage is minimized during the logging operation.

The forest Service has much to be proud of in the Elk River drainage, and has demonstrated its ability to manage the area for optimum production of all its resources. I urge you to adopt your Proposed Action for management of the Butler Mt.-Dry Creek planning unit.

Sincerely,


George E. Knowles

- | | |
|-----------------------|-----------------------|
| 1. Nena Jenner | 51. Elmer Tantare |
| 2. Ruhl Gorham | 52. Earl Eikenberry |
| 3. F. Howard | 53. Jerry Hanoun |
| 4. Burrell S. Babb | 54. Leon Burgess |
| 5. Jack Bate | 55. James Donnelly |
| 6. David Freeman | 56. Robert Meyer |
| 7. Robert Gardner | 57. Ralph Morry |
| 8. Henry Prohosce | 58. Kelvin Morin |
| 9. Francis A. Nelson | 59. Bob Mc Son |
| 10. Kenneth Bonds | 60. Gary L. Couterey |
| 11. Raymond Wright | 61. Michael C. Corte |
| 12. Steve Salisbury | 62. Albert Borgs |
| 13. James O. Cross | 63. Harold Ruebush |
| 14. Ornel Dawson | 64. W. Williams, Jr. |
| 15. John Losey | 65. David Denton |
| 16. Dan Nix | 66. Alfred Moline |
| 17. Larry Lochman | 67. John Marrington |
| 18. Dan Berry | 68. Mike Erin |
| 19. Dorothy Spees | 69. Dan Allen |
| 20. Russell Nelson | 70. Neil Martens |
| 21. William Hinkle | 71. Frank Lord |
| 22. Souja Coy | 72. Chestor Scott |
| 23. Dorothy Saeterlee | 73. Wilkie Burns |
| 24. Ara Saeterlee | 74. Allen Smith |
| 25. Michael Hahn | 75. Raymond Allen |
| 26. R. Fox | 76. Odom Ford |
| 27. Ray Lockman | 77. Howard Rigel |
| 28. Carol Lockman | 78. Clifford Suttne |
| 29. Louis Beeke | 79. Larry Nett |
| 30. Helen Anderson | 80. B. Burun |
| 31. C. Newdenhall | 81. Byron Rattka |
| 32. C. L. Anderson | 82. C. Cogburn |
| 33. Darrell Otto | 83. Joseph Remington |
| 34. Jane Otto | 84. Ron Long |
| 35. M. Couch | 85. William Pate |
| 36. W. Bradley | 86. Charles Goffeld |
| 37. Jerry Gerard | 87. Steven Smith |
| 38. S. Allen | 88. Michael Alves |
| 39. Marvin Hager | 89. John McKernan |
| 40. Gregory Sumner | 90. Cecil Rodgers |
| 41. Richard Sumner | 91. Frederick Reiling |
| 42. William Kinser | 92. Marian Lamm |
| 43. David A. Cosner | 93. Marjorie Renhard |
| 44. Anne Wuduand | 94. G. Julie Ettinger |
| 45. Louis Kaufman | 95. Robin Anderson |
| 46. Glen Trauz | 96. Albert Mincll |
| 47. Raymond Pruitt | 97. Helen Reiling |
| 48. Robert Nelson | 98. R. Bliss |
| 49. William Caneth | 99. Harry Danak |
| 50. L. M. Bradley | 100. Roland Alexander |

Supervisor
Siskiyou National Forest
Box 440
Grants Pass, Oregon 97526

Dear Sir:

Regarding the Mt. Butler-Dry Creek Planning Unit, I support Alternative #3 for the reason that it would provide the most benefit for the most people while still giving maximum protection to the environment. Curry County is not so blessed with resources that we can afford to dedicate more acreage to single-use management.

343

Mrs. Anna A. Floyd
(Name)
Brookings Ore 97415
(City) (State) (Zip)

101.	Lloyd Smith	151.	William Lindborg	201.	Betty Jean Gibson	251.	Darrell Babb
102.	Stanley Patterson	152.	Lynn C. Cook	202.	Windslow Bangs	252.	Bill Eller
103.	Lloyd Hyde	153.	Archie B. Davidson	203.	Leona Bangs	253.	R. D. Fort, Jr.
104.	Bobby Davidson	154.	Albert A. Winslow	204.	Paul R. Kessler	254.	Ron Mc Murray
105.	Joe E. Brown	155.	Kismet Winslow	205.	E. C. Van Eaton	255.	Judy Mc Murray
106.	David Wedding	156.	Fred Anderson	206.	Kenneth Olson	256.	Lois Blankenship
107.	Allan Doan	157.	Kyln Worlton	207.	Michael Bates	257.	W. Blankenship
108.	Ernest Buchles	158.	Stanley Gordon	208.	C. W. Doamy	258.	Jerry Conant
109.	Charles Walirs	159.	Harley Mitts	209.	Rex Nichles	259.	Rose Marie Alvarado
110.	Harold Nieholson	160.	Ford Conrad	210.	James D. Beieiner	260.	Ralph Long
111.	Guy Way	161.	Lyle Tareh	211.	Donald L. Payne, Jr.	261.	Mrs. Royce Mc Manama
112.	John Smith	162.	Enis Ask	212.	Earl King	262.	Royce Mc Manama
113.	Charles Behie	163.	Joel Bran	213.	J. Michael Phillip	263.	Jim R. Ritz
114.	John Laufa	164.	Henry Hill	214.	John Showers, Jr.	264.	James P. Smith
115.	Darrell Bobb	165.	Virgil Tareh	215.	Dale Christensen	265.	Otto Bieberdorf
116.	Donald Carpenter	166.	Ivan Vroomer	216.	Tim Corrigan	266.	M. D. Floyd
117.	Carol Carpenter	167.	Jay Rambeck	217.	Fred Bagley	267.	Ray G. Throne
118.	Henry Potter	168.	John W. Ballsman	218.	Don Marrington	268.	Alvis Mc Donald
119.	Donald Smith	169.	Michael K. Cook	219.	Harvey Mahack	269.	John C. Bell
120.	James H. Kron	170.	Frank W. Denton	220.	Robert H. Krinkle	270.	Jim Shields
121.	Gomer A. Rettke	171.	Jerry Williamson	221.	James R. Ramm	271.	Dale Music
122.	Raymond Reelman	172.	John N. Peterson	222.	Donald W. Cox	272.	John Scherbarth
123.	J. N. Sieniller	173.	A. R. Doan	223.	Annetta J. Cox	273.	Carol G. Wood
124.	Max Swanberg	174.	Edson Davis	224.	Larry C. Thomas	274.	Paul J. Stattard
125.	Robert D. Corter	175.	Edwin Matson	225.	Dennis E. Hyde	275.	Denis Wheaton
126.	Byran K. Olds	176.	William Clapson	226.	Dale Hoie	276.	Calvis Dishue
127.	Donald Raymond	177.	Robert Micherson	227.	Jack Giffen, Sr.	277.	William Russell
128.	Claude Morin	178.	John Foughud	228.	Robert J. Johnson	278.	Robert G. Fanter
129.	Michael Giffen	179.	Tim Griffin	229.	Charles R. Erichson	279.	Kenneth Eldred
130.	Charles Roland	180.	Margaret Salisbury	230.	Ralph Nordling	280.	Clarence W. Evans
131.	Herb Arlandson	181.	Chester Thompson	231.	Eva Nordling	281.	T. Wa Carbe
132.	Ron Edwards	182.	Randy Salisbury	232.	Eih O'Borg	282.	Wendell Corlie
133.	Floyd Mosier	183.	Wanda Thompson	233.	Ruth R. Brewer	283.	Kendal Grover
134.	Robert Bromlette	184.	Sam Gott	234.	Sharon J. Magnuson	284.	Albert W. Connard
135.	Cecil Beauchamp	185.	Jewell Gott	235.	Mrs. Margaret Delvin	285.	Wallace Ronsem
136.	Edgar Baln	186.	Phylena Muncy	236.	Evelyn M. Nading	286.	Thomas J. Short
137.	Arthur Durham	187.	Frank Akin	237.	Ardith K. Brewer	287.	Garry S. Burdett
138.	Frederich Zimmerman	188.	Donna Fallert	238.	Arnold G. Magnuson	288.	Paul H. Muffenbier
139.	John Stokes	189.	Ron Fallert	239.	Harold V. Keech	289.	George W. Hoxit
140.	Lawrence Olds	190.	Bob Gaston	240.	V. L. Nading, Jr.	290.	Mrs. G. Hoxit
141.	Emil Suhursky	191.	Paul V. Hansen	241.	Hardy L. Lancaster	291.	Dale L. Chapman
142.	Lynn Kofford	192.	Marjory Hansen	242.	Elmer S. Lee	292.	William B. Peterson
143.	Robert Bate	193.	Alice Rush	243.	Lila F. Lee	293.	Delores Peterson
144.	Thomas Stanford	194.	Williamina Donnelly	244.	Roma J. Gerard	294.	John Jarvis
145.	Lawrence Harsen	195.	Edward A. Gheer	245.	Suzanne L. Sugg	295.	Dee Jarvis
146.	P. Hebert Jacobs	196.	Gwendolyn Chandler	246.	Christina Borja	296.	Delores Nowlin
147.	Charles Buntis	197.	Reah Music	247.	Malinda R. Hedenskog	297.	Vincint Boja
148.	Gary L. Coates	198.	Julie Gheese	248.	Leonard A. Hedenskog	298.	Robert S. Boydston
149.	Lloyd Gates	199.	Linda Waldien	249.	Kent Owens	299.	Charlie White
150.	Denton Drenman	200.	Blaine Wald	250.	Mrs. Darrell Babb	300.	Herman D. Higelap

301. Letha D. Hall
 302. Larry Cheffl
 303. Judith A. Pierson
 304. Bille Cheffl
 305. Harry C. Hall, Jr.
 306. Edna Whiteley
 307. Brad E. Coleman
 308. John A. Brewer
 309. Thomas E. Zong
 310. Helgi H. Hannesson
 311. Viola Andrews
 312. Lawrence Andrews
 313. W. Budda
 314. Sidney Wood
 315. Viola M. Wood
 316. Anne Jenkins
 317. Walter Thornton
 318. Mary Thornton
 319. W. P. Manany
 320. June Manany
 321. Ray Swigert
 322. Dale Coleman
 323. Dale Dorris
 324. B. Reed
 325. B. Dowden
 326. T. Dowden
 327. Darwin Doane
 328. Garry Morris
 329. Eugene Wood
 330. Jack Danges
 331. Edmond R. Grey
 332. C. Frazier
 333. Guy M. Swap
 334. Howard A. Nelson
 335. Joe Hodge
 336. Charles L. Sugg
 337. Jesse W. Hoazland
 338. Edward Crogton
 339. Laurence N. Hall
 340. Lanz L. Britt
 341. John A. Mauti
 342. Ernest E. Akin
 343. Wilton L. Willey
 344. William E. Smith
 345. Arthur K. Brewer
 346. Dayle Krogy
 347. Carl A. Prough
 348. David Hodge
 349. Lilare Keech
 350. Lois Erickson

351. Albert Flanigan
 352. Richard A. Stone
 353. Harry J. Stone
 354. Ray Lane
 355. Florence Lane
 356. Richard Mc Niel
 357. Gerald E. Penter
 358. June Penter
 359. Dorothy M. Soward
 360. Lois E. Fresh
 361. Robert B. Collier
 362. Mary E. Zuber
 363. John A. Zuber
 364. Donald G. Buhr
 365. Theodore W. Miller
 366. Vernon Hoeflein
 367. Daniel Exton
 368. Dolores Buks
 369. June Hicks
 370. Stephen A. Witter
 371. Ann Witter
 372. W. Ron Hiedenskog
 373. Rose Marie Hiedenskog
 374. Nancy Short
 375. Lois Floyd
 376. David Floyd
 377. Anna A. Floyd
 378. N. Arden
 379. Charles A. Anderoa
 380. Mrs. Lewis Williamsen
 381. Lewis A. Williamsen
 382. Donald F. Rosecrans
 383. Mrs. Michael Hansen
 384. Jerry A. Lea
 385. Nanette C. Reallon
 386. Garth E. Lyons
 387. Arnold M. Wellenbrock
 388. Elmer Secor
 389. John D. Peterson
 390. Dan Nollul
 391. Alvin A. Pierson
 392. Mrs. Alvin Pierson
 393. Lee F. Mowlin
 394. Katherine L. Bonde
 395. Darrel J. Bonde
 396. Paul Fallgreen
 397. Elina M. Davis
 398. Gery Robinson
 399. Neil L. Rodoni
 400. Lawrence E. Grough

401. Al Clements
 402. William Merritt
 403. Allen B. Find
 404. David K. Young
 405. Glen Fish
 406. H. Hollenbeck
 407. Ernest Christensen
 408. A. J. Reed
 409. Calvin Musse
 410. Homer T. Simmons
 411. Lee Morse
 412. Joe Hretz
 413. Arlie Barb
 414. Leland Holme
 415. Victor Berke
 416. William Herovila
 417. Dallas Ettinger
 418. Roy Williams
 419. Dick Purke
 420. Joseph Sidra
 421. L. W. Welleubrook
 422. Michael L. Cole
 423. George Moser
 424. Dwaine Hickerson
 425. F. Clyma
 426. John A. Zeileu
 427. David Balleri
 428. G. Weaver
 429. Allen Crosby
 430. H. D. Quier
 431. Danyl R. Barton
 432. H. T. Ray
 433. Donald Dooley
 434. Rich Reding
 435. Bill R. Weaver
 436. Vernon Pettepnew
 437. Ron Hardison
 438. Rollin Crump
 439. Robert Gardner
 440. Fred Truker
 441. George L. Gordon
 442. S. O. Sugg
 443. Delbert Kriegl
 444. A. L. Anderson
 445. C. H. Kimberley
 446. Robert C. Smyth
 447. James S. Davis
 448. Mike Triber
 449. Enid Hurst
 450. Glen P. Hurst

451. William S. Muncy
 452. Nell Flanigan
 453. Sydney Mc Lain
 454. Neil Mc Lain
 455. Luella Mc Lain
 456. Nadiene Bodda
 457. Gary Mc Lain
 458. Bruce Mc Lain
 459. Becky Ludwig
 460. Mrs. Carl Burdett
 461. Greg Hall
 462. Gomer Rettko
 463. Larry Ganshorn
 464. Ross A. Baldwin
 465. Gene Stonz
 466. Edward Warner
 467. E. Wieke
 468. Adolph Donat
 469. Clara M. Donat
 470. David H. Haysom
 471. Gene L. Ross
 472. Curtis D. Br
 473. Ralph G. Braun
 474. Eva Louvold
 475. Erniss Louvold
 476. Wil Winter
 477. Russell E. Shawver
 478. Martha Jane Boak
 479. Stanley Boak
 480. Ann R. Dawson
 481. Arlene Giffen
 482. Mary Mac Donald
 483. Tony Traub
 484. James Kochretz
 485. Mrs. Wilber Williams
 486. Wilber E. Williams, Jr.
 487. Barbara F. Hahn
 488. Joseph K. Sedra
 489. Lorence Smith
 490. Joan Nichols
 491. Diane Williams
 492. Pat Williams
 493. William Strohm
 494. Albert Clayton
 495. John L. Shoe
 496. Edgar Phillips
 497. V. Phillips
 498. Linda June Law
 499. Emma C. Heffron
 500. Alvin W. Heffron

501. Chas. E. Jenner
502. Jimmy Dearman
503. Delbert Glass
504. Leonard N. Reus
505. Charles Rorendale
506. Vinton Whiles
507. Stephen L. Cain
508. Phillip L. Lyons
509. Jeff R. Reed
510. S. R. Bechner
511. Jack Parker
512. Gene Ross
513. Nestor Ron Kainin
514. Okley McCraight
515. James Simpson
516. Jack Layne

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|-------------------------|--------------------------|
| 1. Wayne Hancock | 51. Gary L. Kendall |
| 2. Rhonda Hadden | 52. T. Walsh |
| 3. Ruth Wells | 53. Ruston E. Nelson |
| 4. Carol E. Dark | 54. Iva Mae Eldred |
| 5. Luis Hendrix | 55. Stewart L. Graham |
| 6. Samuel Brewer | 56. Joan Ray |
| 7. John Reuref | 57. Patricia M. Johnson |
| 8. Daniel Brewer | 58. Deela Ruell |
| 9. B.D. Jackson | 59. Sandra Ruell |
| 10. James R. Hanson | 60. Harry Boswell |
| 11. Delbert H. Lyman | 61. Jan Chearoth |
| 12. Robert E. Smith | 62. E. A. Fide |
| 13. V. H. Jemleson | 63. Richard A. Stephens |
| 14. Paul McVery | 64. John A. Rose |
| 15. James F. Amor | 65. Doris A. Brewer |
| 16. Fred J. Hobson | 66. Mary Brewer |
| 17. Vernon H. Stone | 67. Calvin K. Harper |
| 18. Edward Wells | 68. Joe Wait |
| 19. Herman Hatter | 69. James Smith |
| 20. T. F. Kern | 70. Lloyd M. Hawkins |
| 21. Muriel Kern | 71. Chester L. Brown |
| 22. Quentin Moore | 72. Albert Clay |
| 23. Alfred Wakeley, Jr. | 73. John C. Kelly |
| 24. Russell Levmett | 74. Edgar Maguire |
| 25. Robert L. Gibson | 75. James Short |
| 26. Harry R. Baker | 76. Richard Hoffman |
| 27. A. G. Lewman | 77. Luis Loyez |
| 28. Charles A. Long | 78. R. Freen |
| 29. James L. Jochson | 79. Adolph G. Muekabauer |
| 30. Arlene I. Green | 80. Jordon L. Grant |
| 31. Roger W. Hadden | 81. Jesse Ocoti |
| 32. David E. Johnston | 82. Eugene Hendricks |
| 33. Charlotte Sherman | 83. Orville Preston |
| 34. Terri Johnson | 84. Mile E. Sella |
| 35. John Canten | 85. William T. Bell |
| 36. Virginia L. Cranmer | 86. Ronald Hebbesiefken |
| 37. Lynda McNeely | 87. Robert Catlett |
| 38. Victoria Ganong | 88. Gloria King |
| 39. Charles Prichard | 89. Wayne J. King |
| 40. Gary L. Pettit | 90. Richard C. Wheeler |
| 41. Peggy Hanns | 91. William D. Allen |
| 42. Timothy Dark | 92. Garland S. Hill |
| 43. Virginia M. Brown | 93. Kathryn Sherman |
| 44. Jo Dodge | 94. Earl Kennedy |
| 45. Eddie R. Stephens | 95. John E. Webb |
| 46. Ray Stephens | 96. Wesley S. Brown |
| 47. Rolf Durk | 97. M. McDaniel |
| 48. Ray Mayers | 98. Homer Hills |
| 49. Wesley L. Brown | 99. Verna Hillis |
| 50. David C. Green | 100. F. Wingate Grant |

Supervisor
Siskiyou National Forest
P. O. Box 440
Grants Pass, Oregon 97526

Dear Sir:

Regarding the Dry Creek - Mt. Butler Planning Unit, Alternative #3 would provide the most benefit for the most people and also provide maximum environmental protection to the area.

Curry County needs all the resources it has left. I therefore support Alternative #3.

Frank J. Stewart
(Name)

Hedderburn Ore. 97491
(City) (State) (zip)

101. Bill Thorp
102. Steven A. Buhl
103. Joseph Mac Pherson
104. Ron Mc Murray
105. R. D. Forth, Jr.
106. Earl Prescott
107. Edward A. Colter
108. Gordon B. Fulz
109. Rich Watson
110. Robert L. Hatch
111. John H. Williams
112. Kenneth Cottrell
113. R. C. Head
114. Inger Davis
115. Rae Lea Frower
116. Glenn A. Schroeder
117. Aral L. Madden
118. Delno K. Hoelme
119. Harold J. Trimble
120. Elizabeth A. Stewart
121. Mike Tasgen
122. Anne Brownell
123. John Rollin
124. Done Koer
125. Eeverly A. Fleshman
126. Lorraine M. Cottor
127. Loren E. Rainboth
128. Blaine C. Goddie
129. Frank Schwart
130. Dwain Cluto
131. Jimmy Dearman
132. Charles Rorendale
133. delbert Glass
134. Leonard N. Reus
135. Vinton Whiles
136. Stephen L. Cain
137. Jeff R. Reed
138. Phillip E. Lyons
139. S. R. Beclmer
140. Gene Ross
141. Jack Parker
142. Nestor Ronkainen
143. Okley McCraight
144. James Simpson
145. Jack Layne

101	Bill Thorp	101	Steven A. Buhl
102	Joseph Mac Pherson	102	Ron Mc Murray
103	R. D. Forth, Jr.	103	Earl Prescott
104	Edward A. Colter	104	Gordon B. Fulz
105	Rich Watson	105	Robert L. Hatch
106	John H. Williams	106	Kenneth Cottrell
107	R. C. Head	107	Inger Davis
108	Rae Lea Frower	108	Glenn A. Schroeder
109	Aral L. Madden	109	Delno K. Hoelme
110	Harold J. Trimble	110	Elizabeth A. Stewart
111	Mike Tasgen	111	Anne Brownell
112	John Rollin	112	Done Koer
113	Eeverly A. Fleshman	113	Lorraine M. Cottor
114	Loren E. Rainboth	114	Blaine C. Goddie
115	Frank Schwart	115	Dwain Cluto
116	Jimmy Dearman	116	Charles Rorendale
117	delbert Glass	117	Leonard N. Reus
118	Vinton Whiles	118	Stephen L. Cain
119	Jeff R. Reed	119	Phillip E. Lyons
120	S. R. Beclmer	120	Gene Ross
121	Jack Parker	121	Nestor Ronkainen
122	Okley McCraight	122	James Simpson
123	Jack Layne	123	

The Following People Returned Form Letter No. 108:

1. ☒ Airfield
 2. ☒ Landing
 3. ☒ Base
 4. ☒ Supply
 5. ☒ Water
 6. ☒ Fuel
 7. ☒ Food
 8. ☒ Shelter
 9. ☒ Communications
 10. ☒ Medical
 11. ☒ Security
 12. ☒ Weather
 13. ☒ Terrain
 14. ☒ Vegetation
 15. ☒ Climate
 16. ☒ Population
 17. ☒ Economy
 18. ☒ Culture
 19. ☒ Religion
 20. ☒ Language
 21. ☒ History
 22. ☒ Geography
 23. ☒ Politics
 24. ☒ Law
 25. ☒ Education
 26. ☒ Science
 27. ☒ Technology
 28. ☒ Industry
 29. ☒ Agriculture
 30. ☒ Transportation
 31. ☒ Infrastructure
 32. ☒ Utilities
 33. ☒ Services
 34. ☒ Commerce
 35. ☒ Finance
 36. ☒ Insurance
 37. ☒ Banking
 38. ☒ Taxation
 39. ☒ Labor
 40. ☒ Unemployment
 41. ☒ Crime
 42. ☒ Health
 43. ☒ Education
 44. ☒ Culture
 45. ☒ Religion
 46. ☒ Language
 47. ☒ History
 48. ☒ Geography
 49. ☒ Politics
 50. ☒ Law
 51. ☒ Education
 52. ☒ Science
 53. ☒ Technology
 54. ☒ Industry
 55. ☒ Agriculture
 56. ☒ Transportation
 57. ☒ Infrastructure
 58. ☒ Utilities
 59. ☒ Services
 60. ☒ Commerce
 61. ☒ Finance
 62. ☒ Insurance
 63. ☒ Banking
 64. ☒ Taxation
 65. ☒ Labor
 66. ☒ Unemployment
 67. ☒ Crime
 68. ☒ Health
 69. ☒ Education
 70. ☒ Culture
 71. ☒ Religion
 72. ☒ Language
 73. ☒ History
 74. ☒ Geography
 75. ☒ Politics
 76. ☒ Law
 77. ☒ Education
 78. ☒ Science
 79. ☒ Technology
 80. ☒ Industry
 81. ☒ Agriculture
 82. ☒ Transportation
 83. ☒ Infrastructure
 84. ☒ Utilities
 85. ☒ Services
 86. ☒ Commerce
 87. ☒ Finance
 88. ☒ Insurance
 89. ☒ Banking
 90. ☒ Taxation
 91. ☒ Labor
 92. ☒ Unemployment
 93. ☒ Crime
 94. ☒ Health
 95. ☒ Education
 96. ☒ Culture
 97. ☒ Religion
 98. ☒ Language
 99. ☒ History
 100. ☒ Geography

United States Department of Agriculture
Forest Service
Siskiyou National Forest
P.O. Box 440
 Grants Pass, Oregon 97526

Attention: Mr. William P. Romayne
Forest Supervisor

275

Being faithfully employed in the wood products industry, I have a personal interest in the management of timber resources tributary to my work location. I am aware that an environmental statement was prepared by the Forest Service for the Mt. Butler-Dry Creek Planning Unit in which five alternative plans have been offered for consideration. By means of this letter I wish to support alternative plan No. 3. I support alternative plan No. 3 for the following reasons:

1. A substantial portion of the potential timber harvest could be realized without this as the first and most important reason to me personally because the threat of lay-off due to lack of raw material for wood processing is a consistent burden to myself and threatens the welfare of my family.
2. I heartily respect the right of man and animal to live and enjoy their natural habitat. In regard to alternative No. 2, I understand that approximately 5,000 acres of roadless fisheries/wildlife area would assure preservation of suitable habitat for the bald eagle, spotted owl, flying squirrel and other species indigenous to the Mt. Bachelor-Dry Creek area. Also, the extensive foot trail system and primitive camps planned for the area would allow all of us ample recreational experience and enjoyment.
3. The buffer protection afforded the creeks and streams within the unit should provide suitable protection for native and migratory species of fish and have no adverse effects on fisheries or fishing.

I can't express the importance of this issue to myself and my family. I hope my support of alternative plan No. 3 for the Mt. Bachelor-Crested planning unit will in some way influence you to weigh the needs of local inhabitants, both man and wildlife, and provide a sane and sound solution in our best interests.

Respectfully submitted,

Mrs. J. B. Howard
 212 W. 11th St.
 Minneapolis, Minn.
 1905

- | | | | |
|-----|---------------------|-----|-----------------------|
| 1. | Edward Williamson | 41. | Mrs. Francis Brimhall |
| 2. | Alan Train | 42. | Harold Siedschlag |
| 3. | Edward Arnett | 43. | J. K. Ingram |
| 4. | Frank C. Arnett | 44. | Eugene J. Bennett |
| 5. | John E. Pickle | 45. | Richard D. Kruse |
| 6. | Henry Van Pelt, Sr. | 46. | Gary S. Lewis |
| 7. | William Van Pelt | 47. | David Smith |
| 8. | V. McDonald | 48. | Donald Richards |
| 9. | Earl A. Sheedy | 49. | F. Neely |
| 10. | William Box | 50. | C. Chymer |
| 11. | Enos E. Nichols | 51. | Robert Louis Bossley |
| 12. | Danell Holycross | 52. | Jay O. Horton |
| 13. | D. Leonard Gutstrom | 53. | Joyce Lillie |
| 14. | Jeary Knight | 54. | Oliver C. Enlund |
| 15. | Wayne E. Nelson | 55. | David W. Pratt |
| 16. | John E. Fischer | 56. | Gerald C. Campbell |
| 17. | Paul Brechanan | 57. | Merlyn F. Miller |
| 18. | Donna M. Tally | 58. | Bruce M. Robb |
| 19. | James D. Cooke | 59. | E. C. McCrachen |
| 20. | Erwin M. Smith | 60. | Harry L. Simons |
| 21. | Mach R. Neely | 61. | William L. Schaefer |
| 22. | Jack McDaniel | 62. | Archie Clawson |
| 23. | Graydon D. Anderson | 63. | Lonnie Wilson |
| 24. | Bobby V. LaDuke | 64. | Gregory Keylock |
| 25. | Delmar L. Alley | 65. | Alfred Jamer |
| 26. | Floyd Di Wald | 66. | William Richards |
| 27. | Gregory Mayea | 67. | Alan Cunningham |
| 28. | Kenneth G. Brady | 68. | Dave Silva |
| 29. | J. Nodine | 69. | Paul E. Wise, Sr. |
| 30. | Martin Pickle | 70. | H. L. Newman |
| 31. | Steve Allen | 71. | Buddy Rayevich |
| 32. | Gary W. McDaniel | 72. | Charles V. Pratt |
| 33. | William E. Miller | 73. | Bill L. Pyatt |
| 34. | James R. Moore | 74. | Charles Masterfield |
| 35. | Sandy Mayse | 75. | Maurice Gonzales |
| 36. | Donald Logan | 76. | Robert S. Cover |
| 37. | Jerry E. Brodie | 77. | Patrick J. Mueller |

Attention: Mr. William P. Ronayne
Forest Supervisor

My husband is employed in the wood products industry, and because his job and our security hinges on the availability of raw material for processing at his work location, I join with him in supporting Alternative No. 3 for the Mt. Butler-Dry Creek Planning Unit. I understand that a sustained yield will be maintained for timber resources harvested under the proposed management of this alternative plan. Being acutely aware of the depressed market existing today in the wood products industry as well as the high rate of unemployment in our county, we live daily with the threat of layoff. The approval of Alternative No. 3 represents a fair and balanced compromise between man and wildlife, industry and ecology, and its adoption could very well secure the availability of gainful employment for my husband for years to come.

Mr. Bobby V. Saenger

Mr. & Mrs. Bobby V. Linder
Rt 3 Box 1259
Roseburg, Oregon 97470

[illegible]

- | | | | |
|-----|------------------------|-----|----------------------------|
| 1. | Mrs. Edward Williamson | 36. | Marie E. Bennett |
| 2. | Mrs. Alan Train | 37. | Mrs. Richard D. Kruse |
| 3. | Debra Hankins | 38. | Janice M. Smith |
| 4. | Erma Arnett | 39. | Patricia Q. Lewis |
| 5. | Jean Van Pelt | 40. | Mary E. Richard |
| 6. | Mrs. Henry Van Pelt | 41. | Mrs. Frank Neely |
| 7. | Deanna Wilson | 42. | Mae Clymer |
| 8. | Mrs. V. McDonald | 43. | Debbie Bossley |
| 9. | Mildred Box | 44. | Charlene Horton |
| 10. | Alice R. Nichols | 45. | Mrs. Oliver Enlund |
| 11. | Barbara Holycross | 46. | Katie McCrachen |
| 12. | Patricia J. Fister | 47. | Murlene Campbell |
| 13. | Mrs. Wayne E. Nelson | 48. | Olive B. Miller |
| 14. | Lois Buchanan | 49. | Jerilyn Robbins |
| 15. | Mrs. Erwin Smith | 50. | Mrs. Wm. Scholfer |
| 16. | Mrs. Mach Nelly | 51. | Mrs. Harry Simmons |
| 17. | Sarah A. Anderson | 52. | Mrs. Archie Clawson |
| 18. | Mrs. Bobby V. LaDuke | 53. | Donna L. James |
| 19. | Marjorie Allen | 54. | Emily Keylock |
| 20. | Mrs. Martin Pickle | 55. | Helda E. Richards |
| 21. | Mrs. Linda Mayea | 56. | Mrs. Alan Cunningham |
| 22. | Mary A. Brady | 57. | Shirley Silva |
| 23. | Thelma Nodine | 58. | Joan M. Wise |
| 24. | Betty DeWald | 59. | Mrs. Herbert Newman |
| 25. | Denise Cooke | 60. | Mrs. Buddy Rayevich |
| 26. | Mrs. Jack R. McDaniel | 61. | Dorothy Pratt |
| 27. | Rebecca L. Breeden | 62. | Mrs. Bill Pyatt |
| 28. | Mrs. James Moore | 63. | Mrs. Charles Masterfield |
| 29. | Florence Miller | 64. | Michelle L. Gonzales |
| 30. | Dolores C. Logan | 65. | Mrs. Robert S. Cowar |
| 31. | J. M. Ranson | 66. | Mrs. Patrick James Mueller |
| 32. | Blanche F. Mast | 67. | Mrs. Cynthia Jennie Muller |
| 33. | Mrs. Gerrald Lillie | | |
| 34. | Mrs. Alvin Brimhall | | |
| 35. | Mrs. Harold Siedschlag | | |

Letter No. 110

June 19, 1975

Forest Supervisor
Siskiyou National Forest
P O Box 440
Grants Pass, Oregon 97526

I would like to make a few comments on the Mt Butler
Dry Creek planning unit.

I do not think you have given enough emphasis to the
economic impact of the timber in this area. You have
only listed the value of the stumpage and finished
products with no consideration of payrolls, suppliers
and other values involved.

The timber industry plays a vital role in the economy
of Southern Oregon and it should be given more emphasis
than you indicated in your proposed plan. I support
action plan No. 5 for maximum timber production. Overall,
I thought the statement was well prepared. Thank you
for allowing me to comment on your statement.

NAME

Joseph D. Nikodym
3328 Green Acres Drive
Central Point, Oregon

97501

ADDRESS

The Following People Returned Form Letter No. 110:

- | | |
|---------------------------|-------------------------|
| 1. Joseph D. Nikodym | 31. Gary Britt |
| 2. Thomas B. Briffson | 32. Oscar N. Johnston |
| 3. Thomas Churchill | 33. Robert D. Pruitt |
| 4. Earl C. Strohkirch | 34. Marion J. Rossiter |
| 5. Frank Jaronitts | 35. G. C. Enez |
| 6. Harold V. Schefstrom | 36. Herman A. Ghea |
| 7. Ronald A. Rossiter | 37. J. P. Ervin |
| 8. Amzie N. Carter | 38. John D. Hagger |
| 9. Richard L. Johnson | 39. Everett Bosborough |
| 10. Larry Marrill | 40. Rex Vincent |
| 11. James G. Rue | 41. Daniel Sorenson |
| 12. Milo M. Feasel | 42. Herschell C. Sutter |
| 13. Joseph E. York | 43. William L. Dickson |
| 14. Richard W. Shafer | 44. Jesus R. Fueutes |
| 15. George W. Hocking | 45. Charles O. Johnston |
| 16. Ronald A. Tresham | 46. Otto E. Pomper |
| 17. Wallace A. Scott | 47. Carl Bone |
| 18. Robert L. Rogers | 48. Monty L. Warden |
| 19. Keith T. Cloudees | 49. Curtic Williams |
| 20. Arthur Juber | 50. James R. Payne |
| 21. Fran D. Yound | 51. Roy C. Forbuss |
| 22. Mildred Smith | 52. Harold A. Dotts |
| 23. Louis A. Young | 53. Frank R. Russell |
| 24. Daniel S. Jones | 54. Wesley Banks |
| 25. Lowell McKenzie | 55. Sandy Tooley |
| 26. Richard G. Sharp | 56. Harold D. Jones |
| 27. Billy B. Waldon, Jr. | |
| 28. Joseph Nelson Chipley | |
| 29. Homer R. Johnson | |
| 30. Tillman Crowner | |

Letter No. 111

MAY 22, 1975

FOREST SUPERVISOR
SISKIYOU NATIONAL FOREST
P.O. BOX 440
GRANTS PASS, OREGON 97526

GENTLEMEN:

PLEASE TALLY MY VOTE IN FAVOR OF YOUR SELECTED ALTERNATIVE FOR MANAGEMENT OF THE MT. BUTLER-DRY CREEK AREA.

IT SEEMS TO ME THAT YOU HAVE GIVEN PROPER CONSIDERATION TO ALL RESOURCES OF THE AREA AND SHOULD BE ALLOWED TO CONTINUE WITH YOUR MANAGEMENT OF THE AREA.

I NOTE THAT LOGGING WILL BE UNDER SOME STRICT CONTROLS AND I THINK THIS IS NECESSARY TO PROTECT WATER QUALITY AND THE FISH RESOURCE.

SINCERELY,

B. Toller

B. TOLLER
2596 WALNUT AVENUE
GRANTS PASS, OREGON 97526

The Following People Returned Form Letter No. 111:

1. Beverly Today
2. B. Collier
3. B. Toller
4. Annabelle H. Dahl
5. J. A. Campbell
6. Aaron Toller
7. P. D. Christensen
8. R. Smith
9. Carla A. Robertson
10. Jack Coulter
11. Jennifer Cushman

Letter No. 112

The Following People Returned Form Letter No. 112:

1. Mary O. Chadbourne
2. Joanne Johnson
3. Thelma A. Huoirla

Date	1/23/75
Address	Box 160
City	Brookings, Oregon
State	OR
Zip	97415
Name	Mary O. Chadbourne
Relationship	Returned Form
Signature	[Signature]
Date	1/23/75

P.O. Box 160
Brookings, Oregon 97415
May 22, 1975

Mr. William P. Ronayne
Forest Supervisor
Siskiyou National Forest
P.O. Box 440
Grants Pass, Oregon 97526

Dear Sir:

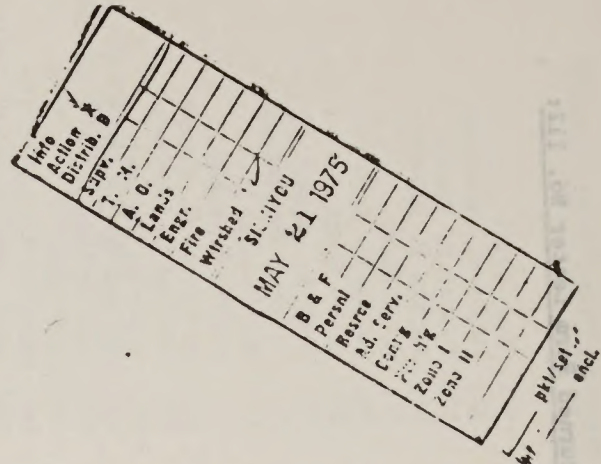
In regard to the Mt. Butler-Dry Creek Planning Unit, I believe the Forest Service has the best interest of Curry County in mind with their wish to adopt alternate three (3).

Conservation and employment must work hand-in-hand and I believe the Forest Service, with their trained, professional people, can see the long-range impact more readily than can the layman.

Sincerely yours,

Joanne Johnson

Forest Service
Siskiyou National Forest
Grants Pass, Oregon
97526



Dear Mr. W.P. Ronayne:

Under the provisions of Public Law 91-190, we the undersigned do hereby express our opposition to the adoption of Alternative #3, the land use plan the Forest Service is proposing for the Mt. Butler-Dry Creek Planning Unit in Curry County, Oregon.

We see the proposed plan as a direct threat to the continued operation of the ELK RIVER FISH HATCHERY and therefore also a threat to our local fishing & agricultural economy and ultimately our World Food Supply.

We urge instead the adoption of whatever plan the State of Oregon's Fish Commission recommends:

NAME	ADDRESS	OCCUPATION
Brian Phillips	Box 28 P.O. Ore.	(Ordnance) Corps of Engineers
Bill Hunt	Box 741 Port Orford	fisherman
Robert Moulton	Port Orford	fisherman
Philip C. Wright	Port Orford	fisherman
Oxenia R. Smith	106 W. 1st St. Port Orford	Fisherman
Jim Harrison	Box 673 Port Orford	Fisherman
Red Loan	P.O. Box 288 Port Orford	Fisherman
Bill Cobb	P.O. Box 562 Port Orford	Fisherman
Robert Linn	P.O. Box 767 Port Orford	Fisherman
Jack Guerin	Box 2 Port Orford	Fisherman
Roy A. Christensen	P.O. Box 785 Port Orford	Fisherman
Carl Christensen	Box 235 SIOUX	"

Copies to:
Fish Commission of Oregon
Senator Bob Packwood
Senator Mark Hatfield
Governor Bob Straub
Congressman Jim Weaver

wpc

Forest Service
Siskiyou National Forest
Grants Pass, Oregon
97526
Forest Service

Dear Mr. W.P. Ronayne:

Under the provisions of Public Law 91-190, we the undersigned do hereby express our opposition to the adoption of Alternative #3, the land use plan the Forest Service is proposing for the Mt. Butler-Dry Creek Planning Unit in Curry County, Oregon. We see that plan as a direct threat to the continued operation of the Elk River Fish Hatchery and therefore also a threat to our local economy and ultimately our World Food Supply.

We urge instead the adoption of whatever plan the State of Oregon's Fish Commission recommends:

NAME	ADDRESS	OCCUPATION
Charles Bates	P.O. Box 138 Port Orford, Ore.	Fishermen
Bob Karas	P.O. Box 561 Port Orford, Ore.	Fisherman
Danny L. Kuhn	STAR RT Box 783 PORT ORFORD, ORE. 97465	FISHERMAN
Frank S. Manly	Star Rt Box 51 Port Orford, Ore 97465	Fisherman
H. O. Corbin	ST. RT. Box 36 PORT ORFORD, OR. 97465	FISHERMAN
Charles Bent	471 Cummins Rd Crescent City	Fisherman
Scott Mecum	Box 285 Port Orford	Fish Buyer
Drew Sweeney	Box 514 Port Orford	Canery worker
John B. Black	Box 644 Port Orford	Leader Fisherman
William R. Mackey	Box 682 Port Orford	Fisherman
Robert Johnson	P.O. Box 747 Port Orford	Retired
Harold Clefield	Box 2592 Harbor	Fisherman
Norm Belden	Box 12	Plywood
Richard Burkett	Box 515, 97465	fisherman

Copies to:
Fish Commission of Oregon
Senator Bob Packwood
Senator Mark Hatfield
Governor Bob Straub
Congressman Jim Weaver

Letter No. 114

Port Orford Chamber of Commerce

PORT ORFORD, OREGON 97465
Most Westerly Incorporated City In The Continental U. S. A.

W. P. Ronayne
Forest Supervisor
Siskiyou National Forest
Grants Pass, Oregon 97526

Dear Mr. Ronayne:

There has been some local discussion of letters to the Editor in the local newspaper with regard to the proposed Mt. Butler - Dry Creek road project. We do not feel that the local people and this area have been sufficiently informed with regard to the proposed road and would like to request a public hearing or meeting be held in this area for this purpose, so that the ones who will be affected most will be informed and can participate in the input.

Very truly yours,

W. P. Ronayne

W. P. Ronayne
President

Info	X	
Action		
Distrib. D		
Supv.		
T. M.		
A. G.		
Lands		
Forest		
Fire		
Wildlife		
Recreation		
Planning		
Public Aff.		
Records		
Training		
Other		

May 15 1975

B & F	
Forest	
Recreation	
Public Aff.	
Records	
Training	
Other	

W. P. Ronayne
President



May 12, 1975

Letter No. 115

POST OFFICE BOX 820
BROOKINGS, OREGON 97415
TEL. 503-469-2127
TWX. 503-591-0330
MANUFACTURERS OF
Plywood - Lumber - Studs



BROOKINGS PLYWOOD CORPORATION

May 16, 1975

W. P. Ronayne, Forest Supervisor
Siskiyou National Forest
P.O. Box 440
Grants Pass, Oregon 97526

Re: Mt. Butler-Dry Creek Planning

Dear Mr. Ronayne:

Brookings Plywood Corporation supports your proposed Alternate #3.

The report reflects a balanced, multi-disciplined evaluation of the areas potential.

Since Brookings Plywood Corporation is a worker-owned corporation with 270 stockholders working in our plant, we wish to offer the vote of all these members.

Thank you for this opportunity to submit our feelings.

Sincerely,
BROOKINGS PLYWOOD CORPORATION

Cecil E. Rodgers

Cecil E. Rodgers
Timber and Lands Manager

CER:rda



The Port With No Bar To Cross

Letter No. 116



American Legion Auxiliary

PORT ORFORD UNIT NO. 76

PORT ORFORD, OREGON

May 17, 1975

Dear Mr. Royane:

We are enclosing a letter that was printed in our local paper and also writing to you in regard to the Mt. Butler - Dry Creek logging situation and also the protection of the fishing and the multiple environment impact that is being projected.

We agree with Dr. Reimers that you should sponsor public meetings and inform the people of this area of your plans and also report back to us and MAX DO sponsor guided tours and DO show us the progress of your management, not only in this area but on adjacent National Forest Land.

People in this area have every right to protest impacts on the environment - as an example the U.S. Engineers have surely ruined the port here at Port Orford and have offered nothing to help the situation.

We would appreciate your comments on this matter.

Sincerely yours,

Mrs. Donald Tubbs

Mrs. Donald Tubbs, Sec.
American Legion Aux.
Box 481
Port Orford, Ore.

Info	✓
Action	✓
Dist. D	✓
Supv.	✓
T. M.	✓
A. O.	✓
Lands	✓
Engr.	✓
Fire	✓
Washed	✓
SISKIYOU	✓
MAY 19 1975	
B & F	✓
Person	✓
Reserve	✓
Ad. Serv.	✓
Cont. 2	✓
Per. 12	✓
2nd. 1	✓
2nd. 11	✓

4/11/1975 each

Letter No. 117

ROSE CITY ARCHERY, INC.

Box 342

POWERS, OREGON 97460

PHONE (503) 439-3254

10 William P. Ronane, Forest Supervisor
Siskiyou National Forest
P.O. Box 440
Grants Pass, OR 97526

DATE 5/19/75

SUBJECT Mt. Butler-Dry Creek
Planning Unit

Dear Mr. Ronayne:

I have reviewed the Mt. Butler-Dry Creek Draft Environmental Statement and find the proposed action (i.e., alternative number 3) do be acceptable to me. I would also support the second alternative.

I believe any plan which did not provide for at least some selective logging would be a mistake. There should be some provision for removal of dead and/or down timber.

Sincerely,

Noble Adamek

Noble Adamek
Rose City Archery, Inc.

Letter No. 118

MENASHA CORPORATION

May 21, 1975

Supervisor
Siskiyou National Forest
P. O. Box 440
Grants Pass, Oregon 97526

Dear Sir:

Being a professional forester I have a concerned interest in your Dry Creek Study area and the Rouge-Illinois Planning Unit. Wise use of these areas dictates that it is possible to manage the land compatible with environment (physical as well as aesthetic) and timber production.

"The best use for the greatest number in the long run" is a slogan that the Forest Service doesn't seem to remember. Pressure from both sides has dictated policy too many times in recent years. You have the team working for you that can do the job, so let's keep timber production and recreation values in harmony. Don't slam the door shut on prime timber production areas!

Sincerely,

MENASHA CORPORATION
Paperboard Division

Fred Crowe

Fred Crowe
Log and Chip Buyer

FC:cm

Letter No. 119

May 21, 1975

Mr. William P. Ronayne
Supervisor, Siskiyou National Forest
P.O. Box 440
Grants Pass, Oregon

Dear Sir,

The Northwest Steelheaders Council of Trout Unlimited has studied your Draft Environmental Statement concerning the Butler-Dry Creek Planning Unit. We find that you have given very little attention to the Fish and Wildlife resources in this Unit. As you know, the Fishery and Wildlife Resource is very valuable to the State of Oregon and its citizens. We feel there is not adequate protection of this resource in your Draft Environmental Statement. Therefore, we ask that you reconsider your plans for this Unit and prepare a new Draft Environmental Statement which protects and preserves the Fish and Wildlife Resource.

Yours for the Resource,

Mike Sallee

Mike Sallee
President of Oregon
N.W. Steelheaders Council
of Trout Unlimited

Info	
T. H.	
A. O.	
Land	
Engr.	
Fire	
Wildlife	✓
Siskiyou	
MAY 23 1975	
S & F	
Patrol	
Rescue	
Acc. Serv.	
Guid.	
Par.	
Zone I	
Zone II	

1/23 pvt/act
ml

Info	
T. H.	
A. O.	
Land	
Engr.	
Fire	
Wildlife	
Siskiyou	
MAY 27 1975	
S & F	
Patrol	
Rescue	
Acc. Serv.	
Guid.	
Par.	
Zone I	
Zone II	

1/23 pvt/act
ml



Letter No. 120
Mailgram
western union
5033472418 MGM TORN BANDON OR 24 05-21 0615P EST
ZIP

Letter No. 120

MGMEUGC EUG
2-042425E141 05/21/75
ICS IPRNCZ CSP
5033472418 MGM TORN BANDON OR 24 05-21 0615P EST
ZIP

USDA FOREST SERVICE SISKIYOU NATIONAL
FOREST, ATTN BILL RONAYNE, DUPLICATE
PO BOX 440
GRANTS PASS OR 97526

WE THE UNDERSIGNED ENDORSE THE US DEPARTMENT OF AGRICULTURE FOREST
SERVICE, PLAN III FOR HARVESTING TIMBER IN THE MOUNT BUTLER DRY CREEK
PLANNING UNIT.
ROGGE LUMBER SALES INC

1817 EST

MGMEUGC EUG

Info	<input checked="" type="checkbox"/>
Admin	<input checked="" type="checkbox"/>
Dist. D	<input checked="" type="checkbox"/>
Supv.	<input checked="" type="checkbox"/>
T. M.	<input checked="" type="checkbox"/>
A. O.	<input checked="" type="checkbox"/>
Lands	<input checked="" type="checkbox"/>
Engr.	<input checked="" type="checkbox"/>
Fire	<input checked="" type="checkbox"/>
Washed	<input checked="" type="checkbox"/>
SISKIYOU	
MAY 22 1975	
B & F	<input checked="" type="checkbox"/>
Person	<input checked="" type="checkbox"/>
Reserve	<input checked="" type="checkbox"/>
Ad. Serv.	<input checked="" type="checkbox"/>
Conf. Z	<input checked="" type="checkbox"/>
Perch E	<input checked="" type="checkbox"/>
Zone I	<input checked="" type="checkbox"/>
Zone II	<input checked="" type="checkbox"/>

pkts/set
w/ encl

Letter No. 121



Post Office Box 939

Telephone (503) 466-2100

Brookings, Oregon
97415

May 22, 1975

Mr. William P. Ronayne
Forest Supervisor
Siskiyou National Forest
P.O. Box 440
Grants Pass, Oregon 97526

Dear Sir:

As General Manager of Agnew Timber Products I would like to take a stand in favor of the USDA Forest Service Environmental Statement concerning land use plans for the Mt. Butler-Dry Creek Planning Unit.

From a professional standpoint, I cannot stress strongly enough the need for our timberlands to be managed by people trained in this field. Policy cannot be dictated by non-professionals that let their emotions cloud their reason.

The Forest Service alternate three (3) plan seems the most reasonable for all citizens of Curry County and I urge the adoption of this plan.

From a personal standpoint I feel economics and conservation must share equally when considering our natural resources.

Sincerely yours,

AGNEW TIMBER PRODUCTS

Lyle Hojem
LYLE HOJEM, General Manager

LH/jj

Info	<input checked="" type="checkbox"/>
Admin	<input checked="" type="checkbox"/>
Dist. D	<input checked="" type="checkbox"/>
Supv.	<input checked="" type="checkbox"/>
T. M.	<input checked="" type="checkbox"/>
A. O.	<input checked="" type="checkbox"/>
Lands	<input checked="" type="checkbox"/>
Engr.	<input checked="" type="checkbox"/>
Fire	<input checked="" type="checkbox"/>
Washed	<input checked="" type="checkbox"/>
SISKIYOU	
MAY 23 1975	
B & F	<input checked="" type="checkbox"/>
Person	<input checked="" type="checkbox"/>
Reserve	<input checked="" type="checkbox"/>
Ad. Serv.	<input checked="" type="checkbox"/>
Conf. Z	<input checked="" type="checkbox"/>
Perch E	<input checked="" type="checkbox"/>
Zone I	<input checked="" type="checkbox"/>
Zone II	<input checked="" type="checkbox"/>

pkts/set
w/ encl



REYNOLDS

ELK RIVER RANCH

PORT ORFORD
97465

97465

Mr. W. P. Rosayne

to a rancher and land
owner on the Elk River in
Curry Co. I am protesting
the land use plan you
have proposed for the
Mt. Butler-Dry Creek
Planning Unit.

Alternative # 2 instead
of Alternative # 3 (your choice)
would be far better for
the eventual safety of
preserving the Elbow

Salmon Hatchery and the
general natural resources
of our area.

I am going on record
as backing alternative #2
and hope that you
would reconsider your
choice of #3.

Sincerely

Mark Reynolds

April 20, 1975

Forest Service
Siskiyou National Forest
Grants Pass, Or. 97526
Forest Supervisor

Dear Mr. W.F. Ronayne:

Under the provisions of Public Law 91-190, I would like to comment against the land use plan the Forest Service is proposing for the Mt. Butler-Dry Creek Planning Unit in Curry County, Oregon. The State of Oregon's Fish Commission does not endorse plan #3, apparently because it would allow logging too near our Elk River Fish Hatchery. I earn my living as a commercial fisherman and have owned my own home in this community for many years. The trees you would have harvested will be exported out of our local economy and trucked to Coos Bay for processing. Our fisheries on the other hand, have a truly LOCAL impact and have kept people working and producing food all during this housing recession. We have been hit hard by the recession and we have been hit hard by the recession. Please, for the sake of both our local Tourist and Fishing industries, abort whatever plan the State of Oregon's Fish Commission feels is best for the continued health and growth of our fisheries.

Thank you,
Dick Burdett
Dick Burdett
A concerned, property-owning
Commercial Fisherman

Copies to:
Governor Bob Straub
Oregon Fish Commission
Senator Mark Hatfield
Senator Bob Packwood
Representative Jim Weaver

Port Gets CETA Funds

An application for CETA II funds has been approved, the port commission learned Monday night, that will provide employment for two maintenance personnel until the end of the fiscal year. The positions will pay \$800 per month, and are to persons who have either been employed for 30 days, or who are underemployed. The jobs were listed with the Employment Division office in Gold Beach Tuesday morning.

An official notice was received from EPA that the port's annual plan and operating manual had been approved and that the balance of grant funds had been recommended for payment.

An unanimous decision, the port decided to write the Forest Service's report of Alternative 2 in the harvesting of timber from the Mt. Butler-Dry Creek area.

In other action, harbor master Bob Noam was instructed to force the jacking of unauthorized vehicles from the dock, and port commissioner Bill Vincent is named to represent the port at CETA hearings. Bills in the amount of \$1,211.33 were approved for payment.

Port Orford News

BOX 5
PORT ORFORD - OREGON 97465
PUBLISHED EVERY THURSDAY
TELEPHONE (503) 332 2361

Official Newspaper
City of Port Orford
Louis L. Felsheim Publisher
Paul L. Peterson Editor and Manager
Nancy J. Peterson Circulation and Composition

SUBSCRIPTION RATES BY MAIL
In Curry County, per year \$5.50
Outside Curry County, per year \$6.50
Single Copy Price: 15 Cents

COPY DEADLINES
Display Advertising 5 p.m. Monday
Classified Advertising 5 p.m. Tuesday
News, Announcements, Photos Noon Tuesday

MEMBER
Oregon Newspaper Publishers Association
NATIONAL PAPER
Association - Founded 1885

Second Class Mail Privileges Authorized at Port Orford, Oregon, Under Act of March 3, 1879

—P—

Brice Wagner, and other livestock and dairymen on the Elk and Sixes Rivers, are feeling somewhat slighted over a brief paragraph contained in the Mt. Butler-Dry Creek Environmental Impact Statement, and well they should be, according to figures Wagner has gathered on the agriculture picture in the Elk-Sixes areas.

The EIS, on page 12, says "Other industries in Curry county include agriculture, fisheries and public employment. Extensive growth in agriculture is unlikely due to the relatively small agricultural land base and the nature of that base."

It was the second sentence that raised hair on the necks of local farmers, Wagner said, so he went looking for some up-to-date facts. And those facts are mighty impressive to say the least.

Wagner says that total acreage now under irrigation on the Elk drainage comes to 1080 . . . and that future potential is another 1425. On the Sixes it's now 450 acres with a potential 800 additional acres.

Income from sheep, dairy and beef cattle on the Elk-Sixes drainage comes to more than three quarters of a million bucks annually . . . not a bad gross for an industry with a "small land base." And anything that might jeopardize that industry . . . such as fouling up a watershed that would reduce summer stream flows . . . certainly wouldn't be in keeping with any intelligent long range planning . . . how would it?

P.O. News 5-08-75

Letter No. 126

Info	Adm.	Dist.	Supv.	T. M.	A. O.	Land	Engr.	Fire	Washed	SLIV	MAY 8 1975	B & F	Person	Ad. Serv.	Cont.	Purch.	Zone I	Zone II	

2
of operation.

I appreciate both industries and I appeal to your better judgement, hoping that Alt. No. 2 will work for both industries.

Thank you for your time in reading my letter. An interested citizen.

Bob J. (Ruth) Roberts
Box 33 Siltkum Rt.
Myrtle Point, Ore. 97458

April 27, 1975-
Coos Bay, Oregon

Dear Sirs:

I recently read in the world newspaper that the forest service is going to allow the excess cutting of timber in the Elk River system, that will result in the raising of the water temperature in the Elk River which will result in the closure of the Elk River fish hatchery.

In protest I would like to ask Do we have a government for the people or for the short sighted business men

Sincerely
Wesley L. Huntley
S. Coos River Rt. Box 209
Coos Bay Oregon
97420

544/5

5/4/5

Dear Sir:

As a member of the S.W. Oregon chapter
of N.W. Steelheaders Council I would like to
speak in favor of Allenatus #1 in the
N X Butler - Dry Creek Study Area.

In reading the report, it is obvious that to have any meaningful features involves that the Dry Creek drainage must be totally protected, and this is the only plan that comes close to his objective.

come close to his argument.
 It is a sad but accurate statement of
 our nation's private timberlands, that only the
 timberlands with waterbodies on public lands
 have any significant fisheries left in them.
 This is especially true of Lewis River.

I would hope the U.S.S. would help advise our Senators and Congressmen to pass meaningful legislation not very much

timberland owners to prevent our protected stream beds, have taken the present unbearable pressure off the streambeds to protect and develop these public lands for the short term - near sighted goal of volume timber with minimal regards for the multiple use concept. +

use concept.
The fisheries have ~~already~~ suffered from the
paper industry and cannot ~~no~~ further
invasion of their stocks, which run (140%)
at 100 levels of 10 years ago.

This is a disgrace. We should have
25-50% fisheries levels before we
developed these lands.

Thank you for listening to my small voice
in the dark. Yours truly, J. Addison

Letter No. 128

Jan 225
Post-Office, Ore
May 7, 1975

Mr. W. P. Ronayne
Siskiyou National Forest
Grants Pass, Ore. 97526

Dear Sir:

We have recently had access to the Environmental Impact Statement regarding the King Creek-Butter Creek area and are definitely against the proposed logging of the area. Being property owners and residents of the River we are in favor of the adoption of Alternative I. In our estimation, the survey included in this statement should mean education of the peoples such that it is our understanding that at present there are trunks already at hand ready to begin building roads, etc, even before the May 13rd date. That this is supposed to be decided the sincerely hope this is not an indication of how this matter will be handled and that the peoples voices will be heard.

Copies sent to
Jack Cunningham, Butte and
Jack E. Hippen, Salem
Ed Stevenson, Salem

Sincerely
Mrs. Charles Fitzhugh

Letter No. 129

May 13, 1975

Mr. W. P. Ronayne
Siskiyou National Forest Service
P.O. Box 440
Grants Pass, Oregon 97526

Dear Mr. Ronayne:

I would most urgently request that you select Alternative

No. 1 or No. 2 in regard to the Mt. Butler-Dry Creek Planning Unit.

It is my opinion that we cannot jeopardize our most valuable fish resources by logging in this unstable watershed.

Thank you for your consideration.

Very truly yours,

Mrs. James H. Sherman

Mrs. James H. Sherman
861 South 12th Street
Coos Bay, Oregon 97420

Info	
Action	
Distib. D	
Supv.	
T. M.	
A. O.	
Lands	
Engr.	
Fire	
Wildlife	
Steward	
MAY 14 1975	
D & F	
Permit	
Service	
Ad. Serv.	
Cont'g	
Purch'g	
Zone I	
Zone II	

plw/ed
for sent

Letter No. 130

Info	✓
Action	✓
Distrib. D	✓
Supv.	✓
T. M.	✓
A. O.	✓
Lands	✓
Engr.	✓
File	✓
Washed	✓
SISKIYOU	
MAY 16 1975	
B & F	✓
Partial	✓
Reserve	✓
Ad. Serv.	✓
Coal'g	✓
Purch'g	✓
Zone I	✓
Zone II	✓

Glendale, Oregon
May 14, 1975

Forest Supervisor
Siskiyou National Forest
Grants Pass, OR 97526

Dear Sir:

I would like to make my feelings known on the management plan for the Mt. Butler and the Dry Creek planning unit.

I fully endorse the multiple use concept of Forest Management.

Of the plans offered by the Forest Service, I would be in favor of the Preferred Alternative as outlined by the Forest Service. I think this plan would offer the most benefits to the most people and still protect the fish and wild life and allow the Forest Service to do a good job of Forest Management.

Sincerely yours,

V. Dean Swanson

V. Dean Swanson

VDS:ms

Mr. V. Dean Swanson
P.O. Box 250
Glendale, OR 97442

Letter No. 131

May 15, 1975

Forest Supervisor
Siskiyou National Forest
P. O. Box 440
Grants Pass, Oregon 97526

I have looked over your environmental impact statement on Mt. Butler - Dry Creek area and am basically in agreement with your proposed action.

I don't think you've given enough emphasis to the economic impact of the timber involved. You've only listed the value of the stumpage and finished products with no consideration of pay-rolls, suppliers, and other values involved.

I note you have done this for the fisheries section and should do the same for timber.

Overall, I thought the statement was well prepared and showed your interest in balanced management for the Siskiyou Forest.

Raymond Butcher

911 N.E. CAMPUS DR.
GRANTS PASS ORE.
97526

Info	✓
Action	✓
Distrib. D	✓
Supv.	✓
T. M.	✓
A. O.	✓
Lands	✓
Engr.	✓
File	✓
Washed	✓
SISKIYOU	
MAY 21 1975	
B & F	✓
Partial	✓
Reserve	✓
Ad. Serv.	✓
Coal'g	✓
Purch'g	✓
Zone I	✓
Zone II	✓

Letter No. 132

Info	✓
Action	✓
Dist. B	✓
Sup.	✓
T. M.	✓
A. O.	✓
Land	✓
Eng.	✓
Fire	✓
Wild	✓
SISKIYOU	
MAY 16 1975	
B & F	
Permit	
Rest	
Ad. Serv.	
Conf.	
Purch.	
Zone I	
Zone II	

May 15, 1975

Forest Supervisor
Siskiyou National Forest
P.O. Box 440
Grants Pass, OR 97526

Gentlemen:

I support your proposed action regarding management of the Mt. Butler - Dry Creek planning unit. It seems to me that this is a balanced program of uses for the area and should satisfy most public demands.

Please tally my vote in favor of your selected alternative for management of the Mt. Butler - Dry Creek area.
Thank you.

Sincerely,

Joanne Cummings

Joanne Cummings

Letter No. 133

Info	✓
Action	✓
Dist. B	✓
Sup.	✓
T. M.	✓
A. O.	✓
Land	✓
Eng.	✓
Fire	✓
Wild	✓
SISKIYOU	
MAY 15 1975	
B & F	
Permit	
Rest	
Ad. Serv.	
Conf.	
Purch.	
Zone I	
Zone II	

May 15, 1975

Forest Supervisor
Siskiyou National Forest
Grants Pass, Oregon 97526

Dear Sir:

I am a Forester 57 years of age. As head of a family of six I have supported them for 39 years, provided them with comfortable living, schooling, a nice home (made of trees (wood)). All of this from nothing but tree management.

I therefore would like to see the whole Mt. Butler - Dry Creek planning unit open to Timber Management, rather than put into a Wilderness Area. I have always believed, and still believe, all of our tree resources should be managed as a crop (a highly valuable crop), also, a renewable crop.

I also like to hunt and fish (in my leisure time) and realize that Game and Fish are valuable also, both as to pleasure of catching as well as eating -- and they too need management.

In view of the above, I would like to go on record as in support of "the Preferred Alternative" for management of the Mt. Butler -- Dry Creek planning unit.

Sincerely,

O. Allen Keatley

O. Allen Keatley
P. O. Box 521
Canyonville, Oregon

WEBCO LUMBER, INC.

May 15, 1975

Mr. William P. Ronagne
Forest Supervisor
Siskiyou National Forest
P.O. Box 440
Grants Pass, Oregon 97526

Dear Mr. Ronagne:

We support your preferred alternative #3 regarding the Mt. Butler - Dry Creek Planning Unit.

Sincerely,
Larry L. Bluhm
Larry L. Bluhm
Forester

LB:rw

Info	✓
Action	✓
Disturb.	✓
Soil	✓
T. M.	✓
A. B.	✓
Land	✓
Eng.	✓
Fire	✓
Washed	✓
SISKIYOU	
MAY 20 1975	
U & F	
Forest	
Basics	
Planning	
Soil	
Water	
Wildlife	
Recreation	
Public	
Other	

Larry L. Bluhm

707 NE "A"
GRANTS PASS

May 15, 1975

Forest Supervisor
Siskiyou National Forest
P. O. Box 440
Grants Pass, Oregon 97526

Of the alternatives presented in your environmental impact statement on Mt. Butler - Dry Creek area, I think you picked a good compromise plan of management.

I think the timber resource could be better utilized, but I recognize that some limitations will have to be imposed to protect other resources. I do believe that with present logging systems, we could log most of the area without other resource damage.

I would suggest that whoever wrote the fisheries section be directed to help the authors of the other sections do a better job explaining their particular field of interest. Some of his statements are a bit far out, but overall he really supports the fish.

Charles T. Wygal

Info	✓
Action	✓
Disturb.	✓
Soil	✓
T. M.	✓
A. B.	✓
Land	✓
Eng.	✓
Fire	✓
Washed	✓
SISKIYOU	
MAY 21 1975	
U & F	
Forest	
Basics	
Planning	
Soil	
Water	
Wildlife	
Recreation	
Public	
Other	

Larry L. Bluhm

Letter No. 136

May 16, 1975

Forest Supervisor
Siskiyou National Forest
P. O. Box 440
Grants Pass, Oregon 97526

Dear Sir:

I support your proposed action regarding management of the Mt. Butler - Dry Creek planning unit.

Overall, I thought the statement as well prepared and showed your interest in balanced management for the Siskiyou Forest.

Very truly yours,

Peggy Fowler

Peggy Fowler
Glendale, Oregon 97442

Info	✓
Actions	✓
Dist. B	✓
Supv.	✓
T. M.	✓
A. G.	✓
Lands	✓
Engr.	✓
Fire	✓
Wildlife	✓
Washed	✓
SISKIYOU	
MAY 16 1975	
D & F	✓
Permit	✓
Recre	✓
Ad. Serv.	✓
Contg	✓
Perch's	✓
Zone I	✓
Zone II	✓

[Signature]
cc: [unclear]

Letter No. 137

5602 Denver Avenue, Space #11
Klamath Falls, Oregon 97601
May 16, 1975

Forest Supervisor
Siskiyou National Forest
P. O. Box 440
Grants Pass, Oregon 97526

Dear Sir:

In reference to the management of the Mt. Butler - Dry Creek Planning Unit, I am completely in favor of the National Forest Service managing this area, due to the need for multiple use of the timberland, wildlife, and water resources. With your resource of knowledge in these fields, I am sure your managing plan will consider all aspects and users of the area.

Yours truly,

Buzz Pounds

Buzz Pounds

Info	✓
Actions	✓
Dist. B	✓
Supv.	✓
T. M.	✓
A. G.	✓
Lands	✓
Engr.	✓
Fire	✓
Wildlife	✓
Washed	✓
SISKIYOU	
MAY 21 1975	
D & F	✓
Permit	✓
Recre	✓
Ad. Serv.	✓
Contg	✓
Perch's	✓
Zone I	✓
Zone II	✓

[Signature]
cc: [unclear]

Letter No. 138

May 16, 1975

Forest Supervisor
Siskiyou National Forest
P.O. Box 440
Grants Pass, Oregon 97526

Dear Sir:

I would like to go on record as supporting your proposed action regarding the management of the Mt. Butler - Dry Creek planning unit. This plan, I believe, is a good compromise plan taking into consideration that all resources must be protected while remaining useful to the public.

Being an avid fisherman and depending on the timber industry for my livelihood I do have strong feelings on this issue. Therefore, I see your program as one that will meet and satisfy most of the public demands.

Very truly yours,

Darrell Woolsey
Darrell Woolsey

Letter No. 139

May 16, 1975

Forest Supervisor
Siskiyou National Forest
P. O. Box 440
Grants Pass, Oregon 97526

Dear Sir:

I would like this letter to support the proposed action of the Forest Service on Mt. Butler - Dry Creek Planning Unit.

It seems to me that you have given proper consideration to all resources of this area, arranged proper management to protect all the resources.

Mrs. David Daniels

Mr. and Mrs. Frank Daniels
1311 N. W. Hawthorne
Grants Pass, Oregon 97526

WEBCO LUMBER, INC.

May 16, 1975

William P. Conayne
Forest Supervisor
Siskiyou N.F.
P.O. Box 440
Grants Pass, Ore 97526

Dear Mr. Conayne,

I support your proposed action regarding management of the Mt. Butler-Creek planning unit. It seems to me that this is a balanced program of uses for the area and should satisfy most public demands.

I question the comparison of fisheries values and timber values. It seems to me that not all the Economic Impact of the timber resources has been considered, but even under the measuring system used, it is pretty important to the coastal area.

I also question whether steelhead fishery on average a net economic benefit of \$20.00 per day as stated on Page 1C. I believe they generate some such amount in the area, but all they get is the happy experience.

Sincerely,

Larry Webb

Larry Webb

May 17, 1975

Forest Supervisor
Siskiyou National Forest
P.O. Box 440
Grants Pass, Oregon 97526

Count me as a supporter of your proposed action regarding the management of the Mt. Butler - Dry Creek planning unit.

I feel strongly that this area should remain open for public use and I believe that your plan is in the best interest of the public.

Proper management of all resources in the area is necessary and you have taken this into consideration. Your plan should meet most of the public demands.

Yours truly,

Billie Woolsey
Billie Woolsey

GP

Info	<input checked="" type="checkbox"/>
Action	<input checked="" type="checkbox"/>
Distrib.	<input checked="" type="checkbox"/>
Supv.	<input checked="" type="checkbox"/>
T. M.	<input checked="" type="checkbox"/>
A. O.	<input checked="" type="checkbox"/>
Leads	<input checked="" type="checkbox"/>
Engr.	<input checked="" type="checkbox"/>
File	<input checked="" type="checkbox"/>
WTR. hnd.	<input checked="" type="checkbox"/>

SL:WCS
MAY 20 1975

Info	<input checked="" type="checkbox"/>
Action	<input checked="" type="checkbox"/>
Distrib.	<input checked="" type="checkbox"/>
Supv.	<input checked="" type="checkbox"/>
T. M.	<input checked="" type="checkbox"/>
A. O.	<input checked="" type="checkbox"/>
Leads	<input checked="" type="checkbox"/>
Engr.	<input checked="" type="checkbox"/>
File	<input checked="" type="checkbox"/>
WTR. hnd.	<input checked="" type="checkbox"/>

SL:WCS
MAY 22 1975

Letter No. 142

Info	✓
Action	✓
Dist. B.	✓
Supv.	✓
T. M.	✓
A. O.	✓
Land	✓
Engr.	✓
Fire	✓
Wild	✓
Washed	✓
SISKIYOU	
MAY 27 1975	
S & F	✓
Person	✓
Harco	✓
P. Serv.	✓
Unit	✓
Page I	✓
Page II	✓

H. G. Givens
H. G. Givens

May 19, 1975

Forest Supervisor
Siskiyou National Forest
P.O. Box 440
Grants Pass, Oregon 97526

Dear Sir:

I am happy see that you are proposing action favoring well balanced management of all the resources in the Mt. Butler-Dry Creek planning unit.

Please count me as a supporter of your plan which will allow usage of resources in the area with proper management.

Sincerely,

Sandra Woolsey

Sandra Woolsey

Sandra Woolsey
2961 Woodland Park Rd.
Grants Pass, Oregon 97526

Letter No. 143

Info	✓
Action	✓
Dist. B.	✓
Supv.	✓
T. M.	✓
A. O.	✓
Land	✓
Engr.	✓
Fire	✓
Wild	✓
Washed	✓
SISKIYOU	
MAY 20 1975	
S & F	✓
Person	✓
Harco	✓
P. Serv.	✓
Unit	✓
Page I	✓
Page II	✓

H. G. Givens
H. G. Givens

May 19, 1975

Forest Supervisor
Siskiyou National Forest
P. O. Box 440
Grants Pass, OR 97526

Dear Sir:

After reviewing your draft environmental statement on the Mt. Butler - Dry Creek planning unit, I have decided to support your selected plan for management of the area.

I think you have properly considered the values involved and have allowed proper management with safeguards to protect all the resources.

I was happy to see that logging will be severely limited in the fisheries - wildlife area. I think this area along Elk River should be maintained in its present conditions. I know we need the timber, but still we have to consider other values.

Thank you for the opportunity to comment on your statement.

Respectfully,

Darlene Luther

Darlene Luther

DL/jlc

GP

Letter No. 144

1208 Martin St.
Klamath Falls, OR 97601
May 19, 1975

Forest Supervisor
Siskiyou National Forest
P. O. Box 440
Grants Pass, Oregon 97526

Dear Sir:

I believe that the National Forest Service should manage the Mt. Butler-Dry Creek planning unit. I feel that they will consider all aspects and users, while making use of the timber, land, wildlife, and water resources.

Sincerely,

Judy Sallee

Judy Sallee

Info	✓
Admin.	✓
Supv.	✓
T. M.	✓
A. O.	✓
Land	✓
Engr.	✓
Fire	✓
Wildlife	✓
SISKIYOU	
MAY 21 1975	
B & F	
Person	
Recre	
Ad. Serv.	
Coop.	
Permit	
Zone I	
Zone II	

W. J. Sallee
w/ each

Letter No. 145

May 19, 1975

Forest Supervisor
Siskiyou National Forest
P. O. Box 440
Grants Pass, OR 97526

Gentlemen:

I support your proposed action regarding management of the Mr. Butler - Dry Creek planning unit. It seems to me that this is a balanced program of uses for the area and should satisfy most public demands.

I question the comparison of fisheries values and timber values. It seems to me that not all the economic impact of the timber resource has been considered, but even under the measuring system used, it is pretty important to the coastal area.

I also question whether steelhead fisherman average a net economic benefit of \$20.00 per day as stated on page 16. I believe they generate some such amount in the area, but all they get is the happy experience.

Respectfully,

Fred Green

Fred Green

FG/jc

Info	✓
Admin.	✓
Supv.	✓
T. M.	✓
A. O.	✓
Land	✓
Engr.	✓
Fire	✓
Wildlife	✓
SISKIYOU	
MAY 20 1975	
B & F	
Person	
Recre	
Ad. Serv.	
Coop.	
Permit	
Zone I	
Zone II	

W. J. Sallee
w/ each

Letter No. 146

May 19, 1975

Forest Supervisor
Siskiyou National Forest
P. O. Box 440
Grants Pass, OR 97526

Dear Sir:

I have looked over your environmental impact statement on Mt. Butler - Dry Creek area and am basically in agreement with your proposed action.

I don't think you've given enough emphasis to the economic impact of the timber involved. You've only listed the value of the stumpage and finished products with no consideration of payrolls, suppliers and other values involved.

I note you have done this for the fisheries section and should do the same for timber.

Overall, I thought the statement was well prepared and showed your interest in balanced management for the Siskiyou Forest.

Sincerely Yours,

Bruce Summers
Bruce Summers

BS/jc

Letter No. 147

Forest Supervisor
Siskiyou National Forest
P.O. Box 440
Grants Pass, Oregon 97526

Dear sir:

Re Mt. Butler - Dry Creek
Planning Unit

I have looked over a copy of your

environmental impact statement prepared for the above

area. It seems to me that you are bending over backwards *selecting*

so much acreage to the Fisheries/Recreation Area, especially to the trail system.

However I also realize that you and your staff are the only ones who have the expertise in this area to make valid decisions about what is best for recreation and what is best for timber management.

Therefore I am relying on your decision that alternate 3 is best for all concerned.

Yours very truly

J.W. Basker
J.W. Basker
1650 Fruitdale Dr
Grants Pass, Oregon 97526

5-19-75

Letter No. 148

May 20, 1975

Forest Supervisor
Siskiyou National Forest
P.O. Box 140
Grants Pass, Oregon 97526

Dear Sir:

I am in agreement with your compromise plan of management presented in your environmental impact statement on Mt. Butler - Dry Creek area.

It seems to me that you have given proper consideration to all resources of the area and should be allowed to proceed with proper management of the area.

Overall, I thought the statement was well prepaid and showed your interest in balanced management of the Siskiyou Forest.

Sincerely yours,

Betty C. James

Betty C. James
P.O. Box 355
Selma, Oregon 97538

Info	Active	✓
Admin.	Dist. B	✓
Supv.		
T. M.		
A. O.		
Leads		
Engr.		
Fire		
Washed		
SISKIYOU		
MAY 22 1975		
B & F		
Person		
Recre		
Ad. Serv.		
Contig		
Patchg		
Zone I		
Zone II		

Approved

Letter No. 149

2730 Watson
Klamath Falls, Oregon 97601
May 20, 1975

Forest Supervisor
Siskiyou National Forest
P. O. Box 440
Grants Pass, Oregon 97526

RE: Management of the Mt. Butler-Dry Creek Planning Unit

Dear Sir:

I feel it would be to everyone's benefit that the National Forest Service manage this area. There is a need for multiple use in this area and I am sure that you will consider all aspects most conscientiously.

Very truly yours,

Bill Walton

Bill Walton

Info	Active	✓
Admin.	Dist. B	✓
Supv.		
T. M.		
A. O.		
Leads		
Engr.		
Fire		
Washed		
SISKIYOU		
MAY 21 1975		
B & F		
Person		
Recre		
Ad. Serv.		
Contig		
Patchg		
Zone I		
Zone II		

Approved

Letter No. 150

Info	✓
Action	✓
Distrib.	✓
Supv.	✓
T. M.	✓
A. O.	✓
Leads	✓
Engr.	✓
Fire	✓
Wildland	✓
SISKIYOU	
MAY 21 1975	
B & F	
Personal	
Basics	
Ad. Serv.	
Costing	
Per. Mgt.	
Zone I	
Zone II	

May 20, 1975

Forest Supervisor
Siskiyou National Forest
P.O. Box 440
Grants Pass, Oregon 97526

Dear Sir:

I support your proposed action concerning the Mt. Butler - Dry Creek planning unit.

I understand that controls are necessary to protect all the resources in the area and I think that you have chosen a basically good plan of management.

Truly yours,

Emily Woolsey

Emily Woolsey
2989 Woodland Park Rd.
Grants Pass, Oregon 97526

Letter No. 151

Info	✓
Action	✓
Distrib.	✓
Supv.	✓
T. M.	✓
A. O.	✓
Leads	✓
Engr.	✓
Fire	✓
Wildland	✓
SISKIYOU	
MAY 21 1975	
B & F	
Personal	
Basics	
Ad. Serv.	
Costing	
Per. Mgt.	
Zone I	
Zone II	

May 20, 1975

Forest Supervisor
Siskiyou National Forest
P. O. Box 440
Grants Pass, Oregon 97526

Dear Sir:

I support your proposed alternative number three as the best choice of management for the area.

The report is an unbiased evaluation of the area's potential to furnish both commodity and amenity benefits, and as such, reflects the involvement of many disciplines.

Thank you for this opportunity to participate in your decision process.

Yours very truly,

Dolores Jackson
Dolores Jackson
730 Redwood Hwy
Grants Pass, Oregon

Letter No. 154

May 20, 1975
Box 172
Bandon, Or. 97411

Siskiyou National Forest
Grants Pass, Or. 97526

Dear Sirs:

As a resident of Sixes River, I have recently become concerned about the proposed logging in the Mt. Butler-Dry Creek area. From what I have read and heard, there is a possibility that this logging could be detrimental to the environment of the Elk and Sixes Rivers. At the Forest Service Meeting in Port Orford, May 20, you seemed confident of present forestry methods in maintaining a well balanced environment. However, I believe there are many factors that have not been tested extensively enough to ensure that the rivers will remain clear and the fish alive. Some farmers have commented to me how the Sixes and Elk Rivers are already lower and fish fewer than years before.

Would it be possible to allow more time to test, experiment and evaluate the pros and cons of logging in the Mt. Butler-Dry Creek area before Port Orford is subjected to another possible environmental failure? Port Orford is suffering greatly now economically and all industries need to be considered. If the Elk and Sixes Rivers are hurt by extensive logging, fishing, tourism and agriculture will all be irreparably affected.

-2-

Therefore, I support Alternative #2 as a realistic solution to the developmental plans for the Mt. Butler-Dry Creek area. It is more attuned to the public interest of the Port Orford area.

Sincerely yours,

Justina S. Morris

Justina S. Morris

copies to: Governor Straub
Senators Hatfield and Packwood
Representative James Weaver
Oregon Environmental Council
Oregon Fish Commission

Info	✓
Action	✓
Dist. B	✓
Supv.	✓
T. H.	✓
A. G.	✓
Land	✓
Eng.	✓
Adm.	✓
Rec.	✓
Mail	✓
Steno	✓
Jan.	✓
Porter	✓
Driver	✓
Security	✓
Fire	✓
Forest	✓
Game	✓
Fish	✓
Wildlife	✓
Recreation	✓
Education	✓
Public	✓
Media	✓
Leg.	✓
Ext.	✓
Int.	✓
Adm. Serv.	✓
Gen. Inv.	✓
Spec. Inv.	✓
Unass.	✓
Ret.	✓
Other	✓
Total	✓
May 22 1975	

Justina S. Morris

A. W. SWEET

1381 BAYVIEW

North Bend, Oregon

97459

"new - comer" basis for my opinion.

My first fishing on both rivers was in the 1920's and our family ownership dates back to 1914. As I have observed the rivers and have fished them for nearly 50 years. I remember well the days of commercial fishing on both.

It appears to me that with the hatchery on Elk River, the precautions you follow in laying out timber sales, and the needs of our economy in Curry County and Oregon, that Alternated 3 is best for all concerned.

Sincerely,
A. W. Sweet

Letter No. 157

May 21, 1975

Forest Supervisor
Siskiyou National Forest
P.O. Box 1410
Grants Pass, Oregon 97526

Dear Sir:

Re: Mt. Butler - Dry Creek
Planning Unit

I have reviewed the environmental statement on the
Mt. Butler - Dry Creek Planning Unit and feel that
alternate 3 provides the best balance for the overall
public.

Sincerely yours,

John P. Krauss
1225 Boundry Road
Grants Pass, Oregon 97526

Date	5/22/75
Action	✓
Distrib. D	✓
Supv.	✓
T. M.	✓
A. G.	✓
Leads	✓
Engr.	✓
Fire	✓
Wildlife	✓
Siskiyew	✓
MAY 22 1975	
D & F	✓
Person	✓
Resource	✓
Planning	✓
Conservation	✓
Recreation	✓
Wildlife	✓
Public	✓

162 gpt/vet
1/1

Letter No. 158

Donald W. Johnson
210 S. Marble Dr.
Grants Pass, Oregon
May 21, 1975

File	
Admin	X
Clm	
Supv.	
T. M.	
A. O.	
Land	
Engr.	
Fire	
Wild	
Washed	
SISKIYOU	
MAY 22 1975	
D & F	
Forest	
Supv.	
Land	
Engr.	
Fire	
Wild	
Washed	

Forest Supervisor
Siskiyou National Forest
P. O. Box 440
Grants Pass, Oregon 97526

Concerning the Mt. Butler-Dry Creek Planning Unit:

Alternative #3 which your plan is written around appears to be a very wise choice, especially when comparing all the information as presented. My only question is the comparison of economic value of fish versus timber value. It seems that the method of arriving at the value of a fish and the method of arriving at the value of a thousand board feet of timber are not comparable in any way. If the two methods were the same, I wonder if timber value might have more significance than shown in your proposed plan.

Overall, the plan appeared proper and showed due consideration of managing all resources equitably.

Sincerely,

Donald W. Johnson
Donald W. Johnson

Letter No. 159

Rachel E. Rolfe
Box B
Powers, Oregon 97466
May 21, 1975

William P Ronayne, Forest Supervisor
Siskiyou National Forest
PO Box 440
Grants Pass, Oregon 97526

Dear Mr. Ronayne:

I wish to go on record in support of
Alternative #3 relative to the future management of the
Mt. Butler-Dry Creek Project.

Thank you for the opportunity of being allowed to give you my opinion in this matter.

Sincerely,

Rachel E. Rolfe
Rachel E. Rolfe

Georgia-Pacific Corporation

P.O. Box 610 Coquille, Oregon 97423 503 / 396-3151
May 21, 1975



Info	✓
Action	✓
Dist. D	✓
Supv.	✓
T. M.	✓
A. O.	✓
Lands	✓
Engr.	✓
Fire	✓
Wildl.	✓
MAI	23 1975
S & F	
Recre.	
Restor.	
Zone I	
Zone II	

United States Department of Agriculture
Forest Service
Mr. William P. Ronayne, Supervisor
Siskiyou National Forest
P. O. Box 440
Grants Pass, Oregon 97526

Dear Mr. Ronayne:

Upon reviewing the draft of the environmental statement on land use plan for the Mt. Butler - Dry Creek Planning Unit, I am in complete accord with your support for Alternative III.

This plan offers a logical approach for the majority with a minimum effect on the timber industry, fishing industry, recreation, etc.

Yours very truly,

Frank W. St. Clair
Frank W. St. Clair
555 Lamb
Coquille, Oregon 97423

FWS:el

Info	✓
Action	✓
Dist. D	✓
Supv.	✓
T. M.	✓
A. O.	✓
Lands	✓
Engr.	✓
Fire	✓
Wildl.	✓
MAI	23 1975
S & F	
Recre.	
Restor.	
Zone I	
Zone II	

Merle R. Kalb, Sr.
PO Box 72
Powers, Oregon 97466
May 21, 1975

William P. Ronayne, Forest Supervisor
Siskiyou National Forest
PO Box 440
Grants Pass, Oregon 97526

Dear Mr. Ronayne:

Thank you for giving me the opportunity of going on record in support of Alternative #3 relative to the Mt. Butler-Dry Creek Project.

I feel this alternative will best suit the timber management needs while still protecting our water supplies and spawning grounds.

Sincerely,

Merle R. Kalb, Sr.
Merle R. Kalb, Sr.

Info	✓
Action	✓
Dist. D	✓
Supv.	✓
T. M.	✓
A. O.	✓
Lands	✓
Engr.	✓
Fire	✓
Wildl.	✓
MAI	23 1975
S & F	
Recre.	
Restor.	
Zone I	
Zone II	

Letter No. 162

May 21, 1975

Mr. W. P. Ronayne
Forest Supervisor
P. O. Box 440
Grants Pass, Oregon

Dear Mr. Ronayne:

I was unable to attend the meeting at the Port Orford Grade School but am concerned about the things I have been hearing. There seems to be too much talk about, "are you for it or against it?" I did not think there was any for or against. I thought it was to be a decision of what would be the best way to go about managing the area around Butler Mountain. Could it be that there were not enough of your published plans for adequate distribution? Would it be possible to get more of these plans down here for public use? Within a short period of time after these plans arrive, could you set up another meeting to permit people like myself to become aware of what you intend and to ask questions?

Since I have two small sons, 7 and 11, I am concerned that not only do they have the forests to harvest, but the ocean also. Cooperation between the various agencies of the government in managing our forests and our streams as well as the ocean could produce miraculous results. You and your co-workers could set an example of what agencies could really do for the taxpayer if they but would.

I will be looking forward to seeing in the local paper where I can get a copy of your plans as well as a notice concerning another meeting.

As ever,

Mrs. Carmen E. Thomas

Mrs. Carmen E. Thomas
P. O. Box 6,
Port Orford, Oregon
97465

Info	✓
Action	✓
Distrib. D	✓
Supv.	✓
T. M.	✓
A. G.	✓
Lands	✓
Engr.	✓
Fire	✓
Wildlife	✓
SISKIYOU	✓
MAY 23 1975	
B & F	✓
Parish	✓
Barre	✓
Adm. Serv.	✓
Comm. F.	✓
Plan. & Insp.	✓
Rec. Mgmt.	✓
Trans. M.	✓

L. J. [unclear]

Letter No. 163

Greetings

*from Box 116
Powers, Oregon 97466*

May 21, 1975

William P. Ronayne, Forest Supervisor
Siskiyou National Forest
PO Box 440
Grants Pass, Oregon 97526

Dear Mr. Ronayne:

Having been a part of a group studying the alternatives relative to the land management use of the Mt. Butler-Dry Creek area project, I wish to go on record in support of your #3 Alternative choice.

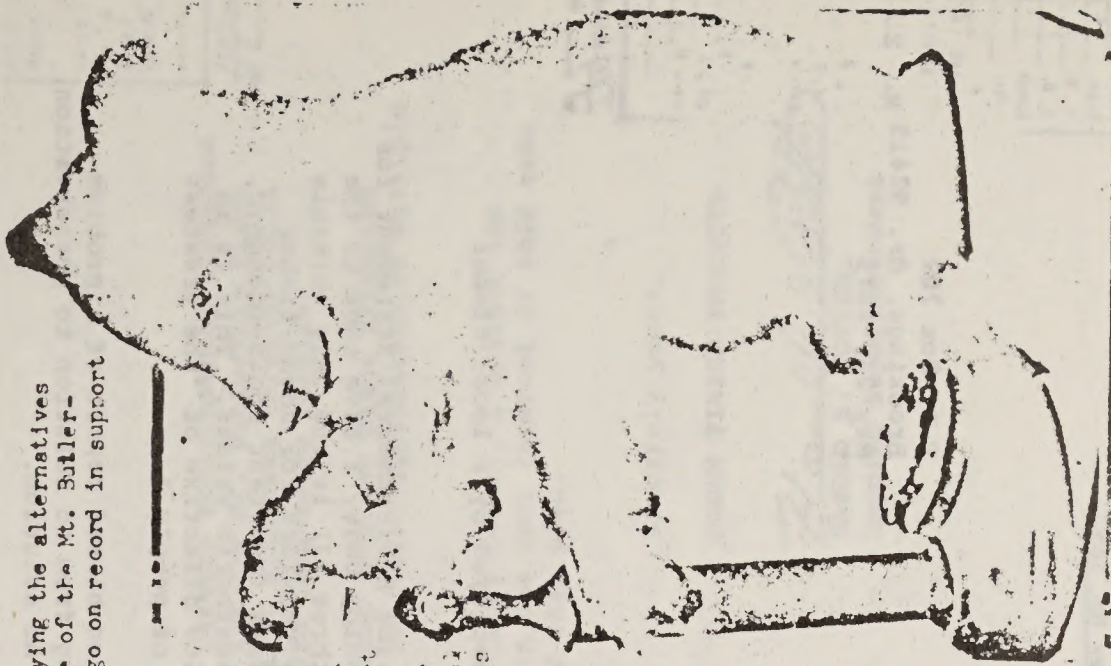
I am also one of the many who feel that our Forest Service is made up of the best qualified technicians in determining the land-management practice in our forest lands.

I have the utmost confidence in our local Forest Service which is a part of your group, not only because of their technical training, but their common sense displayed on many local issues. These men and their families are a real asset to our community.

Thank you for letting us have the opportunity to have a voice in your decision making.

Sincerely yours,

[Signature]
(Mrs. Earl) Harry L. Warner



Info	✓
Action	✓
Distrib. D	✓
Supv.	✓
T. M.	✓
A. G.	✓
Lands	✓
Engr.	✓
Fire	✓
Wildlife	✓
SISKIYOU	✓
MAY 23 1975	
B & F	✓
Parish	✓
Barre	✓
Adm. Serv.	✓
Comm. F.	✓
Plan. & Insp.	✓
Rec. Mgmt.	✓
Trans. M.	✓

L. J. [unclear]



Post Office Box 939

Telephone (503) 469-2106

Brookings, Oregon
97415

May 22, 1975

Mr. William P. Ronayne
Forest Supervisor
Siskiyou National Forest
P.O. Box 440
Grants Pass, Oregon 97526

Dear Sir:

This letter is in response to your request for comments on the USDA Forest Service Environmental Statement concerning land use plans for the Mt. Butler-Dry Creek Planning Unit.

Being a concerned private citizen directly connected with the forest products industry in Curry County I have considered the various land use plans presented, and wish to state that I must concur with that action being proposed by the Forest Service.

In my judgement, alternate three (3) would provide the most beneficial and lasting results, both economic and otherwise, to the Curry community as a whole.

Without going into all the various reasons leading to the above conclusions, I think it sufficient to say that forest and land use planning may be more successfully accomplished if left to professional persons, trained and experienced in this field. It has been my experience that the Forest Service has, in most cases, performed this function very creditably in the past. I further believe this alternate to be a realistic application of the concept of multiple use and wish to strongly urge its adoption.

Sincerely yours,

AGNEW TIMBER PRODUCTS

JACK B. FEENEY, Forester

JBF/jj

P.O. Box 702
Brookings, Or. 97415
May 22, 1975

Mr. William P. Ronayne,
Forest Supervisor
Siskiyou National Forest
P.O. Box 440
Grants Pass, Oregon 97526

Dear Sir:

I am an industrial forester employed by a local timber company.

After reading the Forest Service Environmental Statement for the Mt. Butler-Dry Creek Planning Unit, I have come to the conclusion that alternative three (3) is the only workable solution. This plan not only provides for sound timber management, but also encompasses important socio-economic, environmental, wildlife and aesthetic values. This is in keeping with the Forest Service directive of "the greatest good for the greatest number of people."

The statement is a thorough non-biased report of a problem and various solutions, ranging from no solution to preservation, which is in my opinion again no solution.

I agree that such a long range plan as this should be re-evaluated every five (5) to ten (10) years to insure all the objectives are fulfilled. In conclusion, I would only state that I am in complete agreement with the Forest Service that alternative three (3) is the only workable solution to a difficult problem.

Sincerely yours,

John Minor, Forester

JM/jj

Letter No. 166

1235 Hub Street
Brookings, Oregon 97415
May 22, 1975

Mr. William P. Ronayne,
Forest Supervisor
Siskiyou National Forest
P.O. Box 440
Grants Pass, Oregon 97526

Dear Sir:

Being a forester for a local timber company in Curry County I am interested in seeing Mt. Butler-Dry Creek unit managed with the highest multi-use concept.

I believe alternate plan three (3) has the best socio-economic impact and the greatest net benefits for all facets of industry and recreation in Curry County.

Re-evaluating plan three (3) at 5-10 year intervals is essential in keeping with the socio-economic and technologic advancements.

Sincerely yours,

Steven Nicholson

Steven Nicholson, Forester

Letter No. 167



Brookings, Oregon
97415

May 22, 1975

Mr. William P. Ronayne
Forest Supervisor
Siskiyou National Forest
P.O. Box 440
Grants Pass, Oregon 97526

Dear Sir:

Regarding the USDA Forest Service Environmental Statement concerning land use plans for the Mt. Butler-Dry Creek Planning Unit, I believe that alternate three (3) would provide the most benefit and long-range results.

I have considered the various land use plans presented and feel this is the most realistic application of multiple land use.

As a concerned citizen of Curry County, I believe the Forest Service is acting in the best interest of this area and I urge the adoption of this plan.

Sincerely yours,

AGNEW TIMBER PRODUCTS

Harold S. Potter

HAROLD S. POTTER,
Logging Superintendent

HSP/jj

Post Office Box 939

Telephone (503) 469-2106

Info	✓
Action	✓
Dist. B.	✓
Sup.	✓
T. M.	✓
A. O.	✓
Lands	✓
Eng.	✓
Fire	✓
Wild	✓
May 23	✓
B & F	✓
PM	✓
Res	✓
Zone I	✓
Zone II	✓



Post Office Box 939

Telephone (503) 469-2106

Brookings, Oregon

97415

May 22, 1975

Mr. William P. Ronayne
Forest Supervisor
Siskiyou National Forest
P.O. Box 440
Grants Pass, Oregon 97526

Dear Sir:

In regard to the Mt. Butler-Dry Creek Planning Unit, I believe the Forest Service has the best interest of Curry County in mind with their wish to adopt alternate plan three (3).

Conservation and employment must work hand in hand and I believe the Forest Service is made up of trained professional people who can see the long range impact more readily than can the layman.

Sincerely yours,

AGNEW TIMBER PRODUCTS

Robert E. Earle
ROBERT E. EARLE,
Special Services

Info	✓
Action	✓
Disb.	✓
Sup.	✓
T. H.	✓
A. O.	✓
Lands	✓
Reg.	✓
Adm.	✓
Fin.	✓
Legal	✓
Other	✓
MAY 23 1975	
SISKIYOU	
J. & F.	✓
Adm.	✓
Legal	✓
Other	✓

BEN PEARSON - BRUNSWICK
RT. 1, BOX 170
GOLD BEACH, ORE. 97444

Superior
Siskiyou Nat. Forest
Grants Pass, Ore.

Dear Sir,

In regard to your management of the Dry Creek study area and your - I think planning unit, we would like to see as much timber harvested as possible without undue damage to the environment. Without this timber supply an economy in Curry Co. will not be possible.

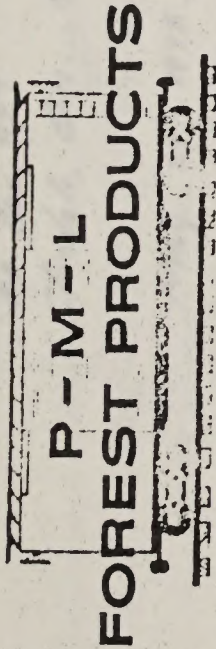
Sincerely

BEN PEARSON
RT. 1, BOX 170
GOLD BEACH, ORE. 97444

Ben Pearson Mgr.

Info	✓
Action	✓
Disb.	✓
Sup.	✓
T. H.	✓
A. O.	✓
Lands	✓
Reg.	✓
Adm.	✓
Fin.	✓
Legal	✓
Other	✓
MAY 27 1975	
SISKIYOU	
J. & F.	✓
Adm.	✓
Legal	✓
Other	✓

pkf/vet
w/ — end



P. O. BOX 311
GRANTS PASS, OREGON 97526

May 22, 1975

Mr. William P. Ronayne
Forest Supervisor
Siskiyou National Forest
P.O. Box 440
Grants Pass, Oregon 97526

Dear Mr. Ronayne:

I would like to notify you that I support the USDA Forest Service Alternative 3, for proposed action in the Mt. Butler - Dry Creek Planning Unit.

Forests are a renewable resource.

Respectfully,

PML FOREST PRODUCTS

Dick Lytle

Dick Lytle
General Manager

DL:ld
enclosure

Info	✓
Action	✓
Distib.	✓
Supv.	✓
T. M.	✓
A. O.	✓
Leads	✓
Engr.	✓
Fire	✓
Washed	✓
SISKIYOU	
MAY 23 1975	
B & F	
Person	
Resrce	
Ad. Serv.	
Cont'g	
Purch'g	
Zone I	
Zone II	

W. P. Ronayne

Info	✓
Action	✓
Distib.	✓
Supv.	✓
T. M.	✓
A. O.	✓
Leads	✓
Engr.	✓
Fire	✓
Washed	✓
SISKIYOU	
MAY 23 1975	
B & F	
Person	
Resrce	
Ad. Serv.	
Cont'g	
Purch'g	
Zone I	
Zone II	

Forest Supervisor
Siskiyou National Forest
P.O. Box 440
Grants Pass, Oregon 97526

Dear Sir:

I think you picked a good compromise plan of management on the Mt. Butler - Dry Creek area. You have properly considered the values involved & have allowed proper management with safeguards to protect all the resources. Although severely limited in the fisheries-wildlife area, I feel we can protect the supply of timber from the area without permanent damage to the areas natural resources.

Again, I commend you on your choice of alternatives.

Sincerely,

Gathy Wall

Gathy Wall
1183-14 SW Service
Grants Pass, Ore.
97526

Lt. 1 Box 2 A
Dodd Beach, Or.
May 22, 1975-97444

Bill Ronayne, Supervisor,
Siskiyou National Forest
Grants Pass, Oreg.

Dear Sir,

we feel the Mt. Butler - Dry Creek Area should be managed on a multiple use basis, As we need the timber for the economy of Curry County.

Also a road and trail system should be developed that would permit access for all our Citizens. we would therefore support your alternative plan No. 3.

Sincerely yours

Owen V. Sloan
L. Leo Sloan

Supervisor
Siskiyaw National Forest.
P.O. Box 440
Grants Pass Ore

Dear Sir

I am definitely in favor of
multiple use of both the Rogers-
Dry creek study area and Rogers-
Illinois Palamang unit.

Sincerely yours
Douglas M. Clever
P.O. Box 315
Brackley Cre. 979

Info	✓	
Action	✓	
Distrib	D	
Supp.		
T. C.		
A. D.		
Leads		
Exp.		
Pre		
Worked	✓	
SIC	160	
JUN 2 1975		
b 2 f		
Perml		
Carne		
		glt/ret
		glt/ret

Letter No. 174

Ronald A. Brandt

P.O. Box 427

Glendale, Ore. 97442

May 29, 1975

Forest Supervisor

Siskiyou National Forest

P.O. Box 440

Grant's Pass, Ore. 97526

Concerning: Mt. Butler - Dry Creek Planning Unit.

This letter is sent in support of your proposed selected alternative for management of the Mt. Butler - Dry Creek Planning Unit. I feel you have given proper consideration to the resources of the area and should proceed with your management plans.

You have placed strict controls on proposed activities in the area which should protect water quality and the fish resource beyond the degree of mother nature.

Very truly,

Ronald A. Brandt

Letter No. 175

Forest Supervisor
June 3, 1975

To Whom it may concern -
After looking over Environment statement of Mt. Butler - Dry Creek alternatives, I think the Forest Service should be allowed to carry on their timber management & road developing as needed. The economy is too bad now, without taking more timber out of production.

Sincerely
John Bushnell

SEARCHED	INDEXED
SERIALIZED	FILED
JUL 4 1975	
FBI - PORTLAND	

3 JUNE, 1975

SUPERVISOR
SISKIYOU NATIONAL FOREST
Box 440
GRANTS PASS, OREGON 97526

DEAR SIR,
CONCERNING THE MT BUTLER- DRY
CREEK PLANNING UNIT, I WOULD LIKE
TO SAY THAT I SUPPORT ALTERNATIVE
NUMBER 3. I BELIEVE THAT THE
PRODUCTIVE TIMBER LAND IN THIS AREA
SHOULD BE MANAGED FOR TIMBER
PRODUCTION SO THAT THE WOOD PRODUCTS
INDUSTRY IN OUR COMMUNITIES CAN
CONTINUE TO OPERATE. I BELIEVE
THE ENVIRONMENT NEEDS PROTECTION
(AND ALTERNATIVE 3 PROVIDES THIS) BUT
NOT AT THE EXPENSE OF OUR INDUSTRIES.

SINCERELY,
Cameron Lynn

PLEASE FIVE DAYS RETURN TO
CAMERON LYNN
RT 1 Box 31
BROOKINGS, ORE. 97815
ZIP CODE

Info	1
Action	1
Distrib.	1
Supv.	1
T. M.	1
A. O.	1
Land	1
Engr.	1
Fire	1
Wild	1
Washed	1
SISKIYOU	1
JUN 9 1975	1
B & F	1
Permit	1
Restroom	1
Ad. Sign	1
Gen. Sign	1
Permit	1
Zone 1	1
Zone 2	1
Zone 3	1

Forest Supervisor
Siskiyou National Forest
Grants Pass, Oregon

c/o P. O. Box 389
North Bend, Oregon 97459
June 4, 1975

Dear Sir,

As a professional forester, I support the judgement of the forest service personnel who have drafted the Proposed Action Plan for the Mt. Butler-Dry Creek management unit.

I feel the fisheries and wildlife buffer unit is more than adequate if logging, regeneration, and young growth management are carried out according to the best intensive forestry management guidelines. Any further compromise towards preservation would remove a productive area from future growth and yield.

If there is a valid need for wilderness and roadless areas in Southwest Oregon, it would seem that the Kalmiopsis Wilderness, the Illinois River valley study area and the Rogue River area would be adequate.

Sincerely,

Dan Robertson
Dan Robertson

DMR/cd

Info	1
Action	1
Distrib.	1
Supv.	1
T. M.	1
A. O.	1
Land	1
Engr.	1
Fire	1
Wild	1
Washed	1
SISKIYOU	1
JUN 18 1975	1
B & F	1
Permit	1
Restroom	1
Ad. Sign	1
Gen. Sign	1
Permit	1
Zone 1	1
Zone 2	1
Zone 3	1

Zone I	Zone II	Zone III	Zone IV	Zone V	Zone VI	Zone VII	Zone VIII	Zone IX	Zone X	Zone XI	Zone XII	Zone XIII	Zone XIV	Zone XV	Zone XVI	Zone XVII	Zone XVIII	Zone XIX	Zone XX	Zone XXI	Zone XXII	Zone XXIII	Zone XXIV	Zone XXV	Zone XXVI	Zone XXVII	Zone XXVIII	Zone XXIX	Zone XXX
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To: Whom it may concern

Subject: MT. Butler - Dry Creek, and Rogue - Illinois Planning Units

I feel that the multiple use concept of land management must be maintained in regards to both of these units

Relating specifically to the MT. Butler - Dry Creek planning unit. It is felt that Alternative 3 is the best proposal to maintain the multiple use concept of land management.

Concerning the Rogue - Illinois Planning Unit it is felt that there is already ample wilderness area, within the state and accessible from south western Oregon, to consider establishing so vast an area in addition to the existing systems. Again I feel that good sound land management with adherence to the multiple use concept is the best approach

For the above reasons I feel that adherence to the multiple use concept of land management would best suit the recreational and socio-economic considerations of southwestern Oregon

Respectfully,
James L. Hunsman
P.O. Box 231
Gold Beach, Oregon
97444

Zone I	Zone II	Zone III	Zone IV	Zone V	Zone VI	Zone VII	Zone VIII	Zone IX	Zone X	Zone XI	Zone XII	Zone XIII	Zone XIV	Zone XV	Zone XVI	Zone XVII	Zone XVIII	Zone XIX	Zone XX	Zone XXI	Zone XXII	Zone XXIII	Zone XXIV	Zone XXV	Zone XXVI	Zone XXVII	Zone XXVIII	Zone XXIX	Zone XXX
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United States Department of Agriculture
Forest Service
Siskiyou National Forest
P.O. Box 440
Grants Pass, Oregon 97526

Attention: Mr. William P. Ronayne
Forest Supervisor

Dear Sir:

My husband is employed in the wood products industry, and because his job and our security hinges on the availability of raw material for processing at his work location, I join with him in supporting Alternative No. 3 for the Mt. Butler-Dry Creek Planning Unit. I understand that a sustained yield will be maintained for timber resources harvested under the proposed management of this alternative plan. Being acutely aware of the depressed market existing today in the wood products industry as well as the high rate of unemployment in our county, we live daily with the threat of layoff. The approval of Alternative No. 3 represents a fair and balanced compromise between man and wildlife, industry and ecology, and its adoption could very well secure the availability of gainful employment for my husband for years to come.

Sincerely,

Mrs Winnie Fickle

PS I support this whole heartedly.

The terrible waste of unharvested timber is a terrible thing to see the waste in not only loss of jobs, harvesting all because people don't understand it to be a crop that can't be held forever as is, it must be cut to save it.

WPF

Letter No. 180

Mrs. Juanita Brown
Rt. 1, Box 85 B
Brookings, Oregon

June 12, 1975

United States Department of Agriculture
Forest Service
Siskiyou National Forest
P.O. Box 440
Grants Pass, Oregon 97526

Attention: Mr. William P. Ronayne
Forest Supervisor

Dear Sir:

My husband has been in the woods products industry all his working life, except for the two and one half years he spent in the service of our country during World War II. He knows the woods and has always logged in a manner that would not destroy nature, knowing the forest is the source of our living. We have studied the Butler-Dry Creek Planning Unit very carefully and desire to see the acceptance of Alternate Plan # 3, as it will utilize the area for human needs and not endanger the wildlife or terrain.

Sincerely yours,

Juanita Brown

Info	✓
Action	✓
Dist. B	✓
Supv.	✓
T. M.	✓
A. O.	✓
Leads	✓
Engr.	✓
File	✓
Washed	✓
SISKIYOU	
JUN 13 1975	
8 & F	
Forest	
Ad. Serv.	
Coast	
Purch	
Zone I	
Zone II	

97415

Letter No. 181

Grants Pass, Ore.

June 13, 1975.

Mr. Bill Ronayne
Forest Supervisor
Siskiyou National Forest
Grants Pass, Ore.

Bill, first I want to thank you for your help in the recent decision to leave the "Smoke Jumpers" base in the Ill. Valley. This has been a very important decision as far as the economy of the Valley is concerned.

I also want to express my support of the Multiple use of the Mt. Butler-Dry Creek planning area. I think that the Forest Service recommendation provides a reasonable use of the area, in line with what most of the public will find acceptable. Balanced management may not satisfy the radical environmental groups, but nothing will satisfy them short of locking everything up for their own uses. The best interests of the most people will be served by Multiple use. Thanks again Bill.

Sincerely

Robert J. Rust
Robert J. Rust

1683 Applegate Ave.

Grants Pass, Ore.

Letter No. 182

June 13, 1975

Forest Supervisor
Siskiyou National Forest
P.O. Box 440
Grants Pass, Oregon 97526

Dear Sir:

Of the alternatives presented in your environmental impact statement on Mt. Butler-Dry Creek area, I think you picked a good compromise plan of management.

I think the timber resource could be better utilized, but I recognize that some limitations will have to be imposed to protect other resources. I do believe that with present logging systems, we could log most of the area without other resource damage.

I would suggest that whoever wrote the fisheries section be directed to help the authors of the other sections do a better job explaining their particular field of interest. Some of his statements are a bit far out, but overall he really supports the fish.

Sincerely,

Barbara A. Kerr
4802 Hulbert Lake Road
Junction City, Oregon 97448

Info	✓
Action	✓
Dist. B	✓
Supv.	✓
T. M.	✓
A. G.	✓
Lands	✓
Engr.	✓
Fire	✓
Washed	✓
SISKIYOU	✓
JUN 17 1975	✓
B & F	✓
Person	✓
Reserve	✓
Ad. Serv.	✓
Conf'g	✓
Purch'g	✓
Zone I	✓
Zone II	✓

ffg psl/mst
W. J. M. M.

Letter No. 183

United States Department of Agriculture
Forest Service
Siskiyou National Forest
P.O. Box 440
Grants Pass, Oregon 97526

Attention: Mr. William P. Ronayne
Forest Supervisor

Dear Sir:

My husband is employed in the wood products industry, and because his job and our security hinges on the availability of raw material for processing at his work location, I join with him in supporting Alternative No. 3 for the Mt. Butler-Dry Creek Planning Unit. I understand that a sustained yield will be maintained for timber resources harvested under the proposed management of this alternative plan. Being acutely aware of the depressed market existing today in the wood products industry as well as the high rate of unemployment in our county, we live daily with the threat of layoff. The approval of Alternative No. 3 represents a fair and balanced compromise between man and wildlife, industry and ecology, and its adoption could very well secure the availability of gainful employment for my husband for years to come.

Sincerely,

Veryla C. Little
(Mrs. Ralph R.)

I believe that every thing should be husbanded and properly managed. Any one who can look at a dead and dying tree and call it beautiful is not properly educated. Over-size timber comes in (over)

Info	✓
Action	✓
Dist. B	✓
Supv.	✓
T. M.	✓
A. G.	✓
Lands	✓
Engr.	✓
Fire	✓
Washed	✓
SISKIYOU	✓
JUN 16 1975	✓
B & F	✓
Person	✓
Reserve	✓
Ad. Serv.	✓
Conf'g	✓
Purch'g	✓
Zone I	✓
Zone II	✓

ffg psl/mst
W. J. M. M.

that category. Maybe mine who cut
it looks do not know that. But it
is their business to know.
Facts that are through growing
now nothing to purify the air. Those
trees could be harvested, if it is
done properly.

I believe that pack back tracks
should be available to those who want
to use them! But access roads near-
by can be of great service in case
of fire or an accident to back-
packers and if put in properly will
do nothing to detract from the beauty
of the scenery and indeed others of
the area who cannot hike.
This is supposed to be a free country
but taking every ones money & use
and for a select few is not equit-
able.
Wild animals cannot live in dense
forests - Every thing needs some sun-
shine. Harvest the ripe trees and the sun
will come through. - Temple C. Hicks

Letter No. 184

Mr. Ronayne, Forest Supervisor
Siikiyon National Forest
Grants Pass, Ore.
Dear Mr. Ronayne,
Locally there has been
much discussion on the
Elk River, dry Creek unit.
I'm in favor of multi-use
on all the Forest Service
lands and agree with your
selection of Alternative #3.

Yours truly
Graa Hoover

HELMES DON KOOSER
BOX 64
GOLD BEACH, ORE.
97444

Letter No. 185

540 North Cedar
Coquille, Oregon
June 24, 1975

Mr. William P. Ronayne
Forest Supervisor
Siskiyou National Forest
P. O. Box 440
Grants Pass, Oregon 97526

Dear Mr. Ronayne:

Re: U.S.D.A. Draft Environmental Statement on Land
Use Plan for the Mt. Butler-Dry Creek Planning Unit

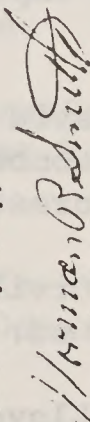
I am in favor of your proposed action for the Mt. Butler-Dry Creek Planning Unit. The Draft Environmental Statement was impressive.

It seems that the economic consideration for the fishery industry and timber industry was not on an equal basis. The value of secondary jobs created was added for fisheries but ignored in the consideration of the timber resource value.

I agree with the restriction on logging for the area; however I wonder if it is right to specify logging methods in advance. In our advancing technology, there could be alternatives to either skyline or helicopter logging in the future.

The statement did a good job of considering all phases of the planning problems and I feel the proposed action is a fair compromise for all phases.

Yours very truly,


Norman R. Smith

Info	✓	
Admin	✓	
Dist.	✓	
Supv.	✓	
T. M.	✓	
A. O.	✓	
Lands	✓	
Egr.	✓	
Fire	✓	
Wildbed	✓	
SISKIYOU		
JUN 25 1975		
B & F		
Basice		
Ad. Serv.		
Conf.		
Perch		
Zone I		
Zone II		

Info	✓	
Admin	✓	
Dist.	✓	
Supv.	✓	
T. M.	✓	
A. O.	✓	
Lands	✓	
Egr.	✓	
Fire	✓	
Wildbed	✓	
SISKIYOU		
JUN 30 1975		
B & F		
Basice		
Ad. Serv.		
Conf.		
Perch		
Zone I		
Zone II		

Letter No. 186

362 East 12th St.
Eugene, Oregon 97401
24 June, 1975

Dear Siskiyou Planning Team,
I am taking advantage of the extension of the input deadline for the Mt. Butler-Dry Creek planning unit to add my comments to your files.

I am opposed to the preferred alternative Number 3, in the draft environmental Statement.

I favor Alternative #1. The benefits to the watershed in the area outweigh the risk of the costs of using that land for timber production, in my opinion. Having read the responses of both the Oregon Wildlife Commission and Reese Bender, it is my strong opinion that you choose Alternative #1 in your final Statement.

I also respect the opinion of Fred J. Swenson and others that the land in the planning unit is valuable in its present, undisturbed state as a natural area. Alternative #1 is the best protection for that value. Thank you for your consideration.

Gayle Patricia Lando

APPENDIX I

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